UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 77 W. JACKSON BOULEVARD CHICAGO, IL 60604

INSTALLATION NAME:

Arcelor Mittal Burns Harbor, LLC

EPA ID No.:

IND003913423

LOCATION ADDRESS:

250 W US Highway 12

Burns Harbor, Indiana 46304-9745

RCRA CLASSIFICATION:

Large Quantity Generator

NAICS CODE:

331111 Iron and Steel Mills

DATE OF RCRA INSPECTION: June 13, 14, 15, 20, 27 - 30, 2011

EPA INSPECTORS:

Robert Dean Smith, LPG

Michael Valentino

PREPARED BY:

REVIEWED BY:

Purpose of the Inspection

EPA's purpose was to conduct a multi-media inspection (MMI) at Arcelor Mittal (AM) in order to determine the subject's compliance with a variety of environmental laws and regulations.

Principal Participants, RCRA Inspection

EPA

Mark Maloney, Environmental Engineer, Westlake Field Office, Region 5 John Gierczak, Environmental Engineer, Westlake Field Office, Region 5 Cher Salley, Geologist, Westlake Field Office, Region 5 Robert Dean Smith, LPG, EPA, Environmental Scientist, Region 5 Michael Valentino, EPA, Environmental Engineer, Region 5 Sue Brauer, EPA, Environmental Scientist, Region 5

Indiana Department of Environmental Management

Scott Ormsby, Senior Environmental Manager, Hazardous Waste Compliance John Howard, Senior Inspector, Hazardous Waste Compliance

Arcelor Mittal/Contractors representing Arcelor Mittal

Robert Maciel, Environmental Manager Teri Kirk, Environmental Engineer, Maintenance, Environmental & Utilities Jeffery May, Environmental Compliance Assurance Coordinator, Maintenance, Environmental & Utilities Rich Guerra,

Facility Description

AM operates an integrated steel mill located at U.S. Highway 12 in Burns Harbor, Indiana in northwestern Indiana. The AM facility is capable of producing approximately five million tons of raw steel per year. The facility encompasses 3,100 acres along the southern shore of Lake Michigan, and is bordered on the northeast and southeast by the Indiana Dunes National Park. Operations at this facility began in 1964 under the ownership and operation of Bethlehem Steel Corporation.

Process operations at the AM facility include: two coke oven batteries, a coke by-products recovery plant, a sinter plant, two blast furnaces, a basic oxygen furnace shop, continuous casters, plate mills, 80-inch hot strip mill, acid pickle lines, tandem mill, hot dip coating line, continuous heat treating line, and a temper mill.

AM operates on a 24/7 basis and employs approximately 3,400 people at its Burns Harbor mill.

Inspection

The Inspection began on June 13, 2011. EPA Inspectors Brauer and Smith arrived at AM's office at 250 West Highway 12, Burns Harbor, Indiana shortly after noon to sign in to the facility. The office area is north of Highway 12 and separate from the steel mill and associated production facilities that are south of Highway 12. Other participants arrived on their own from either Chicago or Ohio and signed in separately.

EPA notified AM ahead of time that a multi media inspection was to be conducted at the facility. On the first day, AM conduct a meeting to present safety concerns and company policy or rules regarding non-AM personnel at the facility. A brief overview of the facility was given at that time. It was agreed that the next day and possibly the following day would be used to give the EPA inspectors an overview of the facility by waste stream or waste process; a "windshield" tour. Thereafter, the various media would break up and conduct their inspection during the time in which the inspection was scheduled.

The RCRA Subtitle C portion of the MMI occurred as follows:

- June 13, 2011, the RCRA inspectors participated in the kick-off meeting at the AM office north of Highway 12.
- June 14 and 15, 2011, the RCRA inspectors participated in the process overview (presented by AM representatives) and the "windshield tour".
- June 20, 2011, a RCRA inspector reviewed paperwork.
- June 27, 2011, the RCRA inspectors reviewed paperwork.
- June 28, 2011, the RCRA inspectors inspected the coke plant and associated works, the BOF baghouses and associated works, the LTS baghouses and associated works, the two underground injection wells, the laboratory, and the spent pickle liquor tanks. Paperwork was also reviewed.
- June 29, 2011, the RCRA inspectors visited the Levy Company, the galvanizing lines, the pickling lines, the roll shop, and SMS Mill Services. Paperwork was also reviewed.
- June 30, 2011, the RCRA inspectors visited the LTS baghouse and associated works, and the spent pickle tank. Paperwork was also reviewed. The RCRA team also participated in the post inspection review with AM management.

June 14, 2011

"Windshield Tour"

Briefly, the tour followed the various processes and waste streams found at the facility:

1. <u>Coke Plant</u>: Most wastes are brought back into the coking process. There are 164 ovens contained in two coke oven batteries. It takes 18 hours to transform 34 tons

of coal into 23 tons of coke. AM averages 109 pushes per day per battery. Baghouse dust goes to the Sinter Plant; flushing liquor/ammonia goes into the deep well for disposal. Coal tar and ammonia sulfate crystals are sold as product. Coke breeze (i.e., fines produced from the fracturing of coke during the quenching cycle) is handled by Mid-Continent Coal and Coke, an on-site contractor, which sells the coke breeze back to AM after taking a size cut called buck wheat for off-site sale. Another by-product of the coking process is coke oven gas, which has a heating value of roughly 550 – 570 BTU per cubic foot. Coke oven gas is used in the Blast Furnace, Sinter Plant and Power Station. No hazardous wastes are manifested for off-site disposal from the Coke Plant.

2. <u>Sinter Plant</u>: The Sinter Plant takes coke, BOF baghouse dust, lime baghouse dust, filter cake from the BOF and "anything with iron content" and turns it into conglomerated mass that can be fed into the blast furnace.

3. <u>Blast Furnace</u>: Furnaces C & D built in 1965-1967. Produces 450-500 tons of iron per hour. Furnaces C & D have a combined hot metal production limit of 455,000 tons per month.

4. <u>Levy Company</u>: Independent company that takes AM's slag, processes the slag and sells the slag after processing. The slag is placed into concrete pits. The slag is owned by Levy as soon as it falls off the conveyor belt that feeds the pits.

.5. <u>Power Station</u>: The power station has six boilers. The boilers are fueled by blast furnace gas and coke oven gas, and where needed, are supplemented by natural gas.

6. Basic Oxygen Furnace. The BOF takes iron and turns it into steel. The BOF tips north to be charged and tips south to be tapped.

7. LTS: The LTS increases the quality of steel through vacuum degassing and the final steel chemistry is formulated here.

8. Slab Casters, # 1 and #2: Steel is taken from the LTS and is poured into one of two casters which forms slabs of steel, usually about 10 inches thick, up to 80 inches wide. Torches cut the slabs to workable lengths.

9. Hot Strip Mill: The hot strip mill produces coiled steel from the slabs.

10. Plate Mill: The plate mill finishes plates for sale.

11. Pickling Lines: AM has two pickling lines. Acid that is less than 1% HCl is unusable and is either pumped down one of two deep injection wells for disposal or is sold.

12. Roll Shops: The roll shops refurbish the rollers that are used in the strip and plate mills. The rolls are ground in order to make rough surfaces smooth again.

13. Slab Yards: Slabs of steel are stored in several yards throughout the plant. Slabs are stored inside but are cooled in yards outside.

14. SMS Mill Service: All scrap steel goes to SMS for processing. The steel is then fed back into the BOF.

¹ Number of pushes derived from the following: number of ovens per battery times 24 hours/day divided by number of hours coking time (from charge to push) per oven (i.e., "coking cycle"). In the case of AM, we have: (82 ovens/battery)(24 hours/day) \div 18 hours/push = 109 pushes/battery-day. The Coke Plant thus averages 218 pushes per day (i.e., 109 pushes/battery * 2 batteries). AM averages roughly 4.5 pushes per hour per battery. Therefore, using this hourly estimate, the total number of pushes per day for the Coke Plant is: (4.5 pushes/hour per battery)(24 hours/day)(two batteries) ≈ 216 pushes/day. The numbers are off slightly due to rounding.

15. Laboratory: The laboratory is largely out of use, however, there are a few employees that provide chemical analysis as needed.

June 28, 2011

Inspection Highlights

Coke Plant and associated systems.

We visited the Coke Plant and associated waste management units. Most, if not all, of the hazardous waste generated in association with the production of coke, is recycled back into the coke making process. The following areas were inspected:

- Coal tar and associated equipment
- Coal tar storage tank (photograph 1).
- Sump pumps/secondary containment for tar tank (photographs 2 and 3).
- 3 sided bunker which receives spills and coke fines and stores the material prior to being placed back into the coking process (photographs 4 and 5).
- Ammonium sulfate storage building (photograph 6).
- Coke oven gas condensate extraction valve (photograph 7).
- Coke Battery Number 2 coal tar piping (Photographs 8 and 9).
- Muck oil storage tank and secondary containment (photographs 10 and 11).
- Naphthalene scrubber muck oil tank (photographs 11, 12 and 15).
- Tar sludge tank (photograph 14).
- Sludge mixer tank (photograph 16).
- Out of service tank (photograph 17).
- Abandoned desulfurization system (photograph 18).
- Coal tar off-loading system (photograph 19).
- 1,000,000 gallon ammonia flushing liquid storage tank (photograph 20).
- Underground injection well number 2 (photographs 21 and 22). This is not part of the coking process but is geographically located at or near the coke plant.
- Coke battery number 2, cell number 46 (photograph 23, 24 and 25).
- Coke oven gas condensate storage tank/secondary containment (photographs 26 and 27).

BOF shop and LTS baghouses:

• Roll off box, operated under vacuum, collects the LTS dust, a hazardous waste (photographs 28 – 34). Photograph 29 shows a release of hazardous waste dust on the right side of the photograph. Due to the nature of the inspection, this release was actually identified two days later when EPA re-visited the site, specifically looking for releases of hazardous waste dust.

Pickling Lines

- Inspector Smith observed and photographed spent pickle liquor socks in a 55 gallon steel drum (photograph 35).
- Inspector Smith observed and photographed the spent pickle liquor storage tank. The tank has a capacity of 30,000 gallons. The tank was dated 4/22/11. Dried spent pickle liquor was observed beneath the piping associated with the tank and inside and outside the secondary containment (photographs 36 38).
- Inspector Smith observed and photographed a railroad tanker car that is leased to or owned by Eaglebrook in which AM fills with spent pickle liquor (photograph 39).
- Spent pickle liquor injection well number 2 (photograph 40).
- Sewer manhole at or near the spent pickle liquor tank (photograph 41 -43).

Laboratory

- Inspector Smith observed and photographed a 55-gallon steel drum of laboratory waste that was properly labeled, marked and stored closed. The drum contained F003/F005 (photograph 44).
- Inspector Smith observed and photographed a smaller container, 15 gallon tank, which contained used oil. The drum was properly labeled and managed (photograph 45).
- Inspector Smith observed and photographed a label for the F003/F005 55-gallon drum that was observed in the laboratory (photograph 46).

Galvanizing Shop

- Inspector Smith observed and photographed a less than 90 day hazardous waste accumulation area within the galvanizing shop. Inspector Smith observed and photographed two drums of hazardous waste that were properly managed, labeled, and stored closed. Both drums were dated 6/18/11 (photograph 47).
- Inspector Smith observed and photographed an area adjacent to the less than 90 day hazardous waste storage area that had water and grease on the floor (photographs 48 and 49).
- Inspector Smith observed and photographed a grease bucket in an area adjacent to the less than 90 day hazardous waste accumulation area (photograph 50).
- Inspector Smith observed and photographed a satellite accumulation area in which a 55-gallon drum of waste filters was accumulating. The drum was labeled "chromate, phosphate absorbent materials" and was stored closed (photograph 51). I photographed the label of the 55-gallon drum to show there was no date of accumulation (photographs 52 and 53).
- Inspector Smith observed and photographed the area in which waste chromic acid is generated. The area has a pipe in which the waste acid is removed from the system and secondary containment is in place below the piping. Waste chromic acid residue was observed in the secondary containment (photograph 54, 55 and 56).

- Inspector Smith observed and photographed a satellite accumulation container, a grey plastic 5-gallon bucket. The bucket was closed, had a hazardous waste sticker affixed and was dated 5/5/11 even though satellite accumulation containers do not need a date of accumulation (photograph 57 and 58).
- Inspector Smith observed and photographed the sub basement for the phosphating area. The sub basement had evidence of spilled chromic acid (photographs 59 -61).
- Inspector Smith observed and photographed the hose where chromic acid is loaded onto tanker trucks for transport off-site disposal or treatment. The hose is located on the west side of the building and is accessed through a double door. The hose is coiled and is uncoiled to hook up to the tanker truck. The area has an emergency shower, two concrete/steel bumpers, and emergency pump shut off switches (Photograph 62-66).

Roll shop

- Inspector Smith observed and photographed a roll-off box which accumulates swarf for off-site disposal. The roll-off box had a hazardous waste label, was stored closed, and was dated 6/27/11 (photographs 67 and 68).
- Inspector Smith observed and photographed the hazardous waste hopper for grinder number 6 (photograph 69 and 72).
- Inspector Smith observed and photographed the pit in which swarf is collected for grinder number 6. The pit collects the grindings from the rolls, a dredge continuously pulls the swarf up and out of the pit and places the swarf into the hopper seen in photograph 69 (photograph 70).
- Inspector Smith observed and photographed the secondary containment for the hazardous waste hopper for grinder number 6 (photograph 71).
- Inspector Smith observed and photographed the hazardous waste hoppers for grinders numbers 5 and 6 (photograph 73).
- Inspector Smith observed and photographed the interior of the hazardous waste hopper for grinder number 3 (photograph number 74).
- Inspector Smith observed and photographed the hazardous waste hopper and secondary containment for grinder number 3 (photograph 75).
- Inspector Smith observed and photographed the hazardous waste hopper and secondary containment for grinder number 2 (photograph 76).
- Inspector Smith observed and photographed the hazardous waste hopper and secondary containment for grinder number 1 (photograph 77).

Maintenance shop

- Inspector Smith observed and photographed a parts washer (photograph 78).
- Inspector Smith observed and photographed a diesel-electric locomotive undergoing maintenance (photograph 79).
- Inspector Smith observed and photographed a 55-gallon drum that contained aerosol cans in satellite accumulation. Adjacent to the aerosol cans drum was an open garbage can with unused, fresh rags and a 5-gallon bucket with a label

"universal waste used batteries". The 5-gallon bucket was stored closed (photograph 80).

• Inspector Smith observed and photographed a second parts washer in the

maintenance shop (photograph 81).

• Inspector Smith observed and photographed a grinding wheel with an open container of grinder waste. The grindings have not been characterized for hazardous waste (photograph 82).

• Inspector Smith observed and photographed a bead blast box and a 15 gallon drum which extracts dust from the box via vacuum (Photograph 83).

LTS baghouse

We returned to the LTS baghouse to determine if any hazardous waste was released from the baghouse as suggested by Lorna M. Jereza, Chief of Compliance Section 1, RCRA Branch, Land and Chemicals Division, EPA Region 5.

- Inspector Smith observed and photographed a small, linear pile of suspected hazardous waste dust that was released from a vacuum roll-off box that was placed near the baghouses associated with the LTS. The photograph shows that the gasket was blown out and that the roll off box was not sealed. The dust was reddish-brown and contrasted the grey color of the dust that seemed to normally cover the area (Photograph 84).
- Inspector Smith observed and photographed that the roll-off box had the serial number V24283. The release of the suspected hazardous waste is seen at the bottom of the roll off box (photograph 85).
- Inspector Smith observed and photographed the release of the suspected hazardous waste close up (photograph 86).
- Inspector Smith observed and photographed the suspected hazardous waste dust box number 5 for the LTS. The photograph shows that there is no reddish brown dust at, under or near the dust box. The dust boxes are the origin of the dust that is placed into the roll-off box via vacuum (photograph 87).
- Inspector Smith observed and photographed another dust box at the LTS and noted there was no reddish brown dust at or near the box (photograph 88).
- Inspector Smith observed and photographed dust in the secondary containment located under a dust box labeled "Module #5". I moved the dust with my foot to determine if the dust was reddish brown. The dust appeared to be grayish on the surface but it could not be determined if the dust was potentially the hazardous waste dust that accumulates in the dust box (photograph 89).
- Inspector Smith observed and photographed dust boxes 3 and 4 (photograph 90).
- Inspector Smith observed and photographed dust boxes 1 and 3. While the ground or concrete below the boxes seem to be reddish or reddish brown, there was no visible dust on the ground. The dust boxes are reddish brown in color (photograph 91).
- Inspector Smith observed and photographed roll-off box V2910 and determined that no hazardous waste dust was released from the roll-off box (photograph 92).

- Inspector Smith observed and photographed that an employee from AM had removed much of the suspected hazardous waste dust as he collected samples for analysis. The photograph clearly shows the blown gasket (Photograph 93).
- Inspector Smith observed and photographed the hazardous waste sticker on the roll-off box that released the suspected hazardous waste dust (photograph 94).
- Inspector Smith observed and photographed the opposite end of the roll off box with the serial number V24283 that released the potential hazardous waste dust. The roll off box had a hazardous waste sticker that was photographed in photograph 94 (photograph 95).

Spent pickle liquor tank

- Inspector Smith observed and photographed liquid in the secondary containment of the spent liquor tank (photograph 96).
- Inspector Smith observed and photographed that the liquid in the secondary containment of the spent pickle liquor tank had a rusty hue (photograph 97).
- Inspector Smith observed and photographed the pump for the spent pickle liquor tank (photograph 98).
- Inspector Smith observed and photographed a hose was flushing a trench that is located at or near the pump for the spent pickle liquor tank (photograph 99).

Some of the spent pickle liquor is sent down the underground injection well or some is sold to Eaglebrook. Inspector Smith observed and photographed residue from spilled spent pickle liquor adjacent to the tank. (Photos 37-38)

Laboratory

Inspector Smith observed and photographed satellite accumulation containers in AM's laboratory. He first observed a 55 gallon drum of rags, marked "F003/F005" and no date of accumulation. Another container held used oil, and a third drum was labeled "F003/F005" with no date of accumulation.

June 29, 2011

Levy

On June 29, 2011, Inspector Smith inspected the Edward C. Levy Company. The information gathered in this inspection is in an inspection report dedicated to Levy.

Hot dip galvanizing

Inspector Smith observed and photographed a less than 90 day hazardous waste accumulation area. Inspector Smith observed and photographed a 55-gallon drum that was labeled "Chrome phosphate" and a date of 6/18/11. Another drum was properly labeled and marked, "waste chrome and phosphate socks, dated 6/18/11".

In this area was a 5 gallon bucket of grease, Inspector Smith observed and photographed grease on the floor.

In the galvanizing shop, Inspector Smith observed and photographed a satellite accumulation area in which a drum was marked "chromate, phosphate absorbent material".

Inspector Smith observed and photographed the chromic acid generation area. Inspector Smith observed and photographed a satellite accumulation drum in this area. Inspector Smith also observed a 5,000 gallon tank in the basement area. The tank was labeled "D007, 5/5/11" and "Chromate/phosphate". Inspector Smith observed and photographed some spillage at and near the tank. The material on the floor is washed into a sump which leads back to the 5,000 gallon tank.

Roll Shop

We inspected the roll shop where AM operates six grinders that are used to smooth the surface of the rolls used to transform slabs of steel into thin coils of steel. The grinders use grit to "sand" or abrade the surface of the rolls. The rolls contain a small amount of chrome which is high enough in concentration to generate a hazardous waste.

Each grinder has a hopper which collects the metal that is ground from the rolls. The metal is called "swarf". The hoppers are emptied each week. A roll off box was observed at the entrance of the building that houses the roll shop. The swarf is transported off site for disposal in the roll off box. The roll off box was dated "6/27/11". The roll off box is transported off site when 10 yards of swarf is accumulated. The swarf goes to EQ in Harvey, Illinois.

Records Review

The RCRA records review portion of the MMI was conducted over a period of several days. What follows is a chronological narrative of this review.

June 20, 2011

Contingency Plan Review

Inspector Smith reviewed the contingency plan (CP). The CP version reviewed was Revision 7, dated 9/30/2010. The original plan was dated 9/14/2002. Inspector Smith took notes on the plan in order to review other documents, such as training and hazardous waste determinations. The CP listed the hazardous waste storage and disposal facilities, the hazardous wastes generated on site, satellite accumulation areas, emergency coordinators, emergency response procedures, incident command team, fire department procedures, oil spill response organization, the environmental management department of AM, emergency telephone numbers, hospitals, health and safety procedures, spills of

hazardous waste, explosions, fire, evacuation plan, assembly areas during evacuation, evacuation map, and a SPCC plan.

Table 1-1 lists areas of the plant where hazardous waste is generated and the kinds of hazardous wastes and the type of container used in storage. The CP also lists and explains the management of wastes and why a waste, generally characterized as hazardous, is not a hazardous waste at AM. For example, the decanter tank tar sludge is recycled through a closed loop system which exempts the waste and thus, the tank from regulation.

Inspector Smith noted that the emergency coordinator list did not have home addresses as required by regulation. Two pages in the CP were marked with page "3-2". The CP states that AM has agreements with Terra Environmental and Industrial Services, however, there is no list of those agreements. The evacuation plan for the whole plant is found on one page; this plan may be too general for a 3100-acre site with many buildings. The evacuation map for the facility is very general; there is nothing about individual buildings on the map, only the plant in general.

June 27, 2011

Inspection Logs and Biennial Reports

The RCRA inspectors arrived at the conference room in the Environmental Department at 9:40 am on June 27, 2011. IDEM inspectors Ormsby and Howard were present. We began with a review of waste streams. Table 1-1 in the Contingency Plan identifies these waste streams. RCRA inspectors also reviewed the Contingency Plan at this time.

The RCRA Inspectors Smith and Valentino requested the following documents for review: hazardous waste manifests (three most recent years); personnel training records; tank and container inspection logs (three most recent years); hazardous waste tank certifications; waste profiles (selected); and the two most recent hazardous waste biennial reports.

The RCRA inspectors reviewed inspection logs beginning January 1, 2009 to the most recent available records on the date of the inspection. All inspection records were observed to be without gaps and in good order with the exceptions noted immediately below.

Inspector Smith reviewed the waste pickle liquor tank inspections. He noted that seven signatures are on the inspection checklists. Two names were not totally decipherable:

"P M Elyholitz" – employee 93919

"Jayt" or "Jay T" Davich, employee 94570

"R. Snincur" employee 91924

"L Pathi" or "A Cathi" employee 96142

Employee 91142 has many different signatures. It does not appear to be different people but a very sloppy, illegible signature.

A common comment found in the inspection checklist is "rain water in secondary containment" and "siphon eductor on."

A summary of the inspection logs for calendar year 2010 and the available 2011 records as of the date of the inspection follow.

Inspection Record	Recording Period
V 1	Α.
Daily WPL 35,000 gal Storage Tank	1/1/10 - 12/31/10
Daily WPL 35,000 gal Reactor Tank at SWTP	1/1/10 - 12/31/10
Daily WAL 30,000 gal Storage Tank	1/1/10 - 12/31/10
Daily WPL 10,000 gal Storage Tank at SWTP	1/1/10 - 12/31/10
LTS Baghouse Area Daily Inspections	1/1/10 - 12/31/10
Decanter Tank, Tank Sludge, Mixing Tank	1/1/10 - 12/31/10
Hot Dip Coating Line - Daily Waste Chromate/Phosphate	*
Sump Inspections	1/1/10 - 12/31/10
Weekly Chromate Filter Sock Container Inspections	1/3/10 - 12/26/10
Weekly Main Chemical Lab Hazardous Waste Inspections	1/4/10 - 12/29/10
Weekly LTS Baghouse Roll-off Inspections	1/6/10 - 12/27/10
Weekly SPL Filter Sock Container Inspections	1/3/10 - 12/26/10
Daily WPL 35,000 gal Reactor Tank @ SWTP	1/1/11 - 4/30/11
LTS Baghouse Roll-off Container Inspections	1/13/11 - 6/13/11
Weekly No. 2 Roll Shop Container Inspections	2/25/11 - 6/20/11
Weekly SPL Filter Sock Container Inspections	1/2/11 - 4/24/11
Weekly Main Chemical Lab Hazardous Waste Inspections	1/3/11 - 6/20/11
Daily WAL 30,000 gal Storage Tank	1/1/11 - 4/30/11
Daily LTS Baghouse Area Inspections	1/1/11 - 5/31/11
Decanter Tank, Tar Sludge and Naphthalene Scrubber	, II
Muck Truck, SIF Mixing Tank and Storage Tank	
Inspections	1/1/11 - 5/31/11
Weekly Hot Dip Coating Line - Chromate Filter Sock	æ
Container Inspections	1/2/11 - 6/19/11
Daily Hot Dip Coating Line - Chromate/Phosphate	X
Sump Inspections	1/1/11 - 6/22/11

AM provided the two most recent hazardous waste biennial reports to EPA for review. AM sent, by certified mail, its biennial reports for reporting years 2007 and 2009 on February 27, 2008 and February 26, 2010, respectively. The largest waste stream generated during reporting years 2007 and 2009 was waste ammonia liquor (WAL) from coking operations. The biennial reports show 465,862 short tons and 397,851 short tons generated in 2007 and 2009, respectively. AM deep well injects its WAL into two deep wells designated as WAL #1 and WAL #2. WAL carries waste codes D010, D018 and D038. The second largest waste stream generated is spent pickle liquor (SPL) with

² Assuming a specific gravity of 1.0, these annual WAL generation rates of 465,862 short tons and 397,851 short tons for 2007 and 2009 correspond to injection rates into WAL #1 and WAL #2 (combined) of 213 gallons per minute (gpm) and 182 gpm, respectively.

annual amounts of 17,401 short tons and 10,189 short tons generated in 2007 and 2009, respectively.³ SPL carries waste code K062, and is also deep well injected, into disposal well SPL #1. The third largest waste stream generated for reporting years 2007 and 2009 was ladle treatment station/steel ladle desulfurization (LTS/SLD) baghouse dust with annual amounts of 147.6 and 92.9 short tons, respectively. LTS/SLD baghouse dust represents the largest single waste stream manifested and shipped off-site.

Because of its deep well disposal practices, AM is regulated not only as an LQG but as a treatment, storage or disposal facility as well. Thus, AM must maintain current dollar closure cost estimates and must demonstrate financial assurance to cover the costs associated with closure. Included with its biennial reports were closure costs estimates of \$690,384.00 and \$804,891.00 for 2007 and 2009, respectively. AM did not produce its financial assurance mechanism at the time of the inspection.

June 28, 2011

Manifests and Training Records

Inspectors Smith and Valentino confirmed that AM representatives produced three years worth of manifests. On June 28, 2011, EPA inspectors reviewed and logged the following 2010-2011inspection logs. EPA inspectors made a cursory review of 2009 inspection logs, mainly to confirm that such records were retained on-site for three years.

Summary of 2010 manifests:

MANIFEST NO.	WASTE DESCRIPTION	WASTE CODES	AM SIGNATURE DATE	TSDF SIGNATURE DATE	RECEIVING FACILITY (TSDF)
-000290085WAS	Ladle treatment	D008	1/21/10	1/22/10	Heritage
3	sludge, 20 cu yd	Q N	PM = 1 F6A		Indianapolis, IN IND093219012
000290086WAS	Ladle treatment	D008	1/22/10	1/25/10	Heritage
	sludge, 20 cu yd				Indianapolis, IN IND093219012
001134523JJK	Waste corrosive	D002, D007	3/9/10	3/9/10	Envirite
	liquid, 1485 gal				ILD9000666206
002822702FLE	SPL filter socks,	K062, D001	3/16/10	3/16/10	PCI
	K062, 165 gal;		9 %		East Chicago, IN
** **	one drum (55 gal)		8	*	
	flammable material, D001			2 0	
002769529FLE	LTS baghouse	D008	4/12/10	4/12/10	Envirite
002/073271 EL	dust, 20 cu yd	D000	12/10	17 12/10	ILD9000666206
002769530FLE	LTS baghouse	D008	4/12/10	4/12/10	Envirite
	dust, 20 cu yd				ILD9000666206
002769584FLE	LTS baghouse	D008	4/26/10	4/26/10	Envirite
* * * * * * * * * * * * * * * * * * *	dust, 20 cu yd			é e e	ILD9000666206

³ Assuming a specific gravity of 1.15, these annual SPL generation rates of 17,401 short tons and 10,189 shorts tons for 2007 and 2009 correspond to injection rates into SPL #1 of 7 gpm and 4 gpm, respectively.

		D007, 600 lb			18	IND093219012
	002769546FLE	LTS baghouse dust, 15 cu yd	D008	5/18/10	5/18/10	Envirite ILD9000666206
	002769545FLE	LTS baghouse	D008	5/18/10	5/18/10	Envirite ILD9000666206
	001134548JJK	dust, 20 cu yd Waste corrosive	D002, D007	6/3/10	6/3/10	Envirite ILD9000666206
	002822753FLE	liquid, 250 gal SPL filter socks,	K062	6/10/10	6/10/10	PCI East Chicago, IN
	0027723015FLE	K062, 165 gal LTS baghouse dust, 25 cu yd	D008	7/28/10	7/28/10	Envirite ILD9000666206
	0027723016FLE	LTS baghouse dust, 25 cu yd	D008	7/28/10	7/28/10	Envirite ILD9000666206
	000353894WAS	HW solid, K087, 25 cu yd	K087	8/23/10	8/23/10	Heritage E. Liverpool, OH
	001134529ЈЈК	Waste corrosive	D002, D007	8/23/10	8/23/10	OHD980613541 Envirite
	000353898WAS	liquid, 884 gal HW solid, K087,	K087	8/24/10	8/24/10	ILD9000666206 Heritage
	000333878WAS	25 cu yd	1.007	5,21110	0/2 // 10	E. Liverpool, OH OHD980613541
	000353899WAS	HW solid, K087, 25 cu yd	K087	8/26/10	8/26/10	Heritage E. Liverpool, OH
	000354070WAS	HW solid, K087, 25 cu yd	K087	8/30/10	8/30/10	OHD980613541 Heritage E. Liverpool, OH
	002772400FLE	LTS baghouse dust, 20 cu yd	D008	8/30/10	8/30/10	OHD980613541 Envirite ILD9000666206
	002772401FLE	LTS baghouse dust, 20 cu yd	D008	8/30/10	8/30/10	Envirite ILD9000666206
- 19	000344831WAS	HW solid, K087, 25 cu yd	K087	8/31/10	9/1/10	Heritage E. Liverpool, OH OHD980613541
	000344832WAS	HW solid, K087, 25 cu yd	K087	9/2/10	9/2/10	Heritage E. Liverpool, OH
	000345087WAS	Pickle liquor, 225	K062	9/21/10	10/1/10	OHD980613541 Heritage Indianapolis, IN IND093219012
*	000345087WAS	K062, 225 lb, 5 drums (625 lb),	K062, D007	9/21/10	10/1/10	Heritage Indianapolis, IN IND093219012
	002781149FLE	D007 LTS baghouse	D008	10/12/10	10/12/10	Envirite ILD9000666206
	002781150FLE	dust, 20 cu yd LTS baghouse dust, 20 cu yd	D008	10/12/10	10/12/10	Envirite ILD9000666206
91	002822816FLE	SPL filter socks, two drums (110 gal), K062	K062	10/13/10	10/15/10	PCI East Chicago, IN
	002781539FLE	Chromate wastewater, 150 gal	D002, D007	11/17/10	11/17/10	Envirite ILD9000666206
	002781637FLE	LTS baghouse dust, 20 cu yd	D008	11/23/10	11/28/10	Envirite ILD9000666206

LTS baghouse	D008	11/23/10	11/28/10	Envirite
dust, 20 cu yd				ILD9000666206
SPL filter socks,	K062, D001	12/21/10	12/23/10	PCI
two drums (110				East Chicago, IN
gal), K062, one				
drum (55 gal)				
waste paint			:48	
	dust, 20 cu yd SPL filter socks, two drums (110 gal), K062, one drum (55 gal)	dust, 20 cu yd SPL filter socks, two drums (110 gal), K062, one drum (55 gal)	dust, 20 cu yd SPL filter socks, K062, D001 12/21/10 two drums (110 gal), K062, one drum (55 gal)	dust, 20 cu yd SPL filter socks, K062, D001 12/21/10 12/23/10 two drums (110 gal), K062, one drum (55 gal)

Summary of 2011 manifests:

13	MANIFEST NO.	WASTE DESCRIPTION	WASTE CODES	DATE GENERATOR	DATE FACILITY	RECEIVING FACILITY	
	008267504ЈЈК	Baghous dust, 20 cu yd	D008	1/4/11	1/4/11	EQ/Envirite Harvey, IL ILD000666206	¥
	008267516ЈЈК	Baghous dust, 20 cu yd	D008	1/5/11	1/5/11	EQ/Envirite Harvey, IL ILD000666206	
	008267548ЈЈК	Baghous dust, 20 cu yd	D008	1/11/11	1/11/11	EQ/Envirite Harvey, IL ILD000666206	
	000379922WAS	20,000 lbs K142	K142	1/11/11	1/15/11	Heritage WTI E. Liverpool, OH OHD980613541	
	003745957FLE	Waste corrosive liquid	D006, D008, D018,	1/13/11	1/13/11	Safety Kleen Dolton, IL ILD980613913	
		> 2 8	D027, D039, D040	2 2 2		îmer.a.	
	001134532JJK	200 gal	D002, D007	2/10/11	2/10/11	EQ/Envirite Harvey, IL	
	008238522JJK	Swarf, 20 cu yd	D007	2/18/11	2/18/11	ILD000666206 EQ/Envirite Harvey, IL	
	008238523ЈЈК	Swarf, 20 cu yd	D007	2/21/11	2/21/11	ILD000666206 EQ/Envirite Harvey, IL	
	008238533ЈЈК	Swarf, 20 cu yd	D007	2/22/11	2/22/11	ILD000666206 EQ/Envirite Harvey, IL	20
	008238617ЈЈК	Swarf, 20 cu yd	D007	3/1/11	3/1/11	ILD000666206 EQ/Envirite Harvey, IL	
	002822865FLE	Waste HCL, 55 gal	D002	3/1/11	3/1/11	ILD000666206 PCI E. Chicago, IN	
	008268614JJK	Baghous dust, 20 cu yd	D008	3/1/11	3/1/11	IND000646943 EQ/Envirite Harvey, IL ILD000666206	
	008268615JJK	Baghous dust, 20 cu yd	D008	3/1/11	3/1/11	EQ/Envirite Harvey, IL ILD000666206	

	008238700JJK	Swarf, 20 cu yd	D007	3/10/11	3/10/11	EQ/Envirite Harvey, IL
77 (B) (F) (F) (F) (F) (F) (F) (F) (F) (F) (F	002646551SKSE	Waste corrosive liquid	D006, D008, D018,	3/14/11	3/14/11	ILD000666206 Safety Kleen Dolton, IL ILD980613913
		* *	D027, D039, D040		* 1	
	008238944ЈЈК	Swarf, 10 cu yd	D007	3/28/11	3/28/11	EQ/Envirite Harvey, IL ILD000666206
	008261013ЈЈК	Swarf, 20 cu yd	D007	3/30/11	3/30/11	EQ/Envirite Harvey, IL ILD000666206
	008261011ЈЈК	Baghous dust, 20 cu yd	D008	3/30/11	3/30/11	EQ/Envirite Harvey, IL ILD000666206
v.	008261012JJK	Baghous dust, 20 cu yd	D008	3/30/11	3/30/11	EQ/Envirite Harvey, IL ILD000666206
*	008261038JJK	Swarf, 10 cu yd	D007	4/4/11	4/4/11	EQ/Envirite Harvey, IL ILD000666206
	002822851FLE	Spent liquor filter socks, 165 gal, K062	K062	4/7/11	4/7/11	PCI E. Chicago, IN IND000646943
	008261120ЈЈК	Swarf, 20 cu yd	D007	4/11/11	4/11/11	EQ/Envirite Harvey, IL ILD000666206
1 *	008261210ЈЈК	Swarf, 15 cu yd	D007	4/18/11	4/18/11	EQ/Envirite Harvey, IL ILD000666206
¥ 1	008261284JJK	Swarf, 15 cu yd	D007	4/25/11	4/25/11	EQ/Envirite
	008261367ЈЈК	Swarf, 20 cu yd	D007	5/2/11	5/2/11	Harvey, IL ILD000666206 EQ/Envirite Harvey, IL
150	008261370ЈЈК	Baghous dust, 25 cu yd	D008	5/2/11	5/2/11	ILD000666206 EQ/Envirite Harvey, IL ILD000666206
÷	008261371JJK	Baghous dust, 25 cu yd	D008	5/2/11	5/2/11	EQ/Envirite Harvey, IL ILD000666206
e p	008261434JJK	10 gal	D002, D007	5/5/11	5/5/11	EQ/Envirite Harvey, IL ILD000666206
* **	008261499ЈЈК	Swarf, 20 cu yd	D007	5/9/11	5/9/11	EQ/Envirite Harvey, IL ILD000666206
	008258584ЈЈК	Swarf, 20 cu yd	D007	5/16/11	5/16/11	EQ/Envirite Harvey, IL ILD000666206
					21	

Employee Training Records

Inspector Smith reviewed hazardous waste training documents for the hot dip line personnel which occurred on 12/17/09. The training was 30 minutes. Inspector Smith noted that a SPCC video was utilized; the video was 7:45 minutes long. Inspector Smith reviewed a power point presentation that included: hazardous waste training, the SPCC short video, evacuation short video, homeland security short video, and the disposal of oil short video.

Training for the main chemical laboratory was on 12/16/09. Those who were trained were listed by job title, name, and employee number. Inspector Smith reviewed documents for the job title Foreman, Shift Manager, UT, MI, SROT, LTS Supervisor, Engineer, OT, SOT, Utility, operating technician, service technician, and shift manager.

Attachments

1. Photo Log

ATTACHEMENT 1

ARCELORMITTAL PHOTOGRAPHS



Facility: Arcelor Mittal, IND003913423

Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 10:23 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 1: Tar Tank C, Coke Battery area, facing N/NE



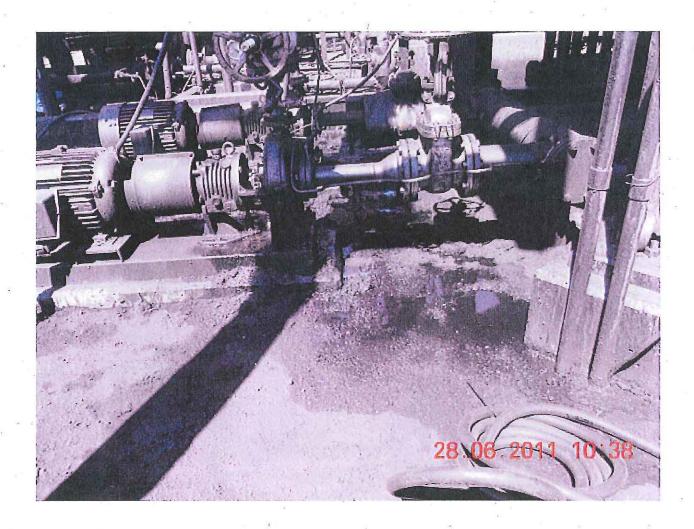
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 10:25 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 2: Close up of leakage from pumps at tar tank sumps into secondary

containment. Facing S/SE.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 10:38 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 3: Drippage at the sumps for the two coal tar tanks (B and C tanks). Drippage into secondary containment. Photo Facing S-SW. Pump containment area of B and C tanks.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 10:46 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 4: Three-sided building where clean up from spills are taken for storage. The floor is lined with coke fines. A vacuum truck or front end loader places the spilled material into the building for storage until the material is recycled into the coke production system. Facing W.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 10:47 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 5: Interior of the Three Sided Building showing the concrete liner. Facing

West.



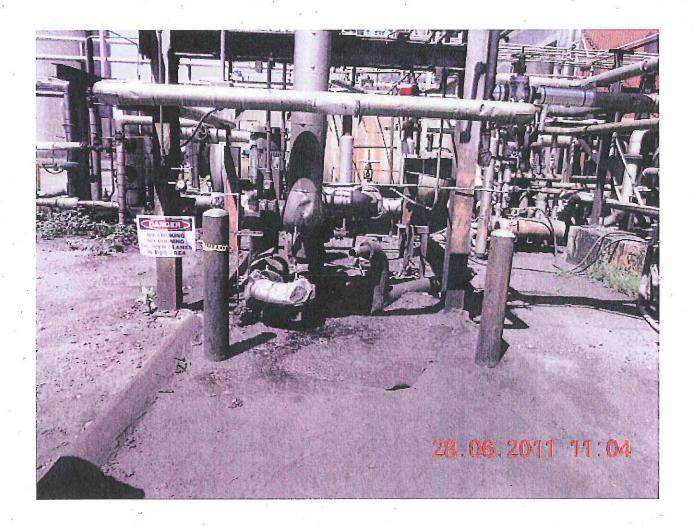
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 10:54 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 6: Ammonium Sulfate, which is sold by Arcelor-Mittal as a product. The

material is a byproduct of the coke making process. Facing W.



Location: 250 West US Highway 12, Burns Harbor, Indiana

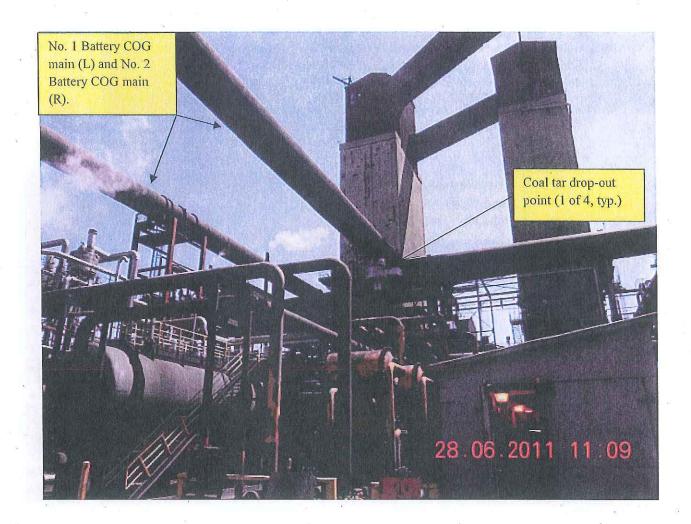
Date: June 28, 2011, 11:04 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 7: Nozzle where a vacuum truck takes coke oven gas condensate back into the tar decanter. The pad has a build up of drippage from the process of loading the tanker. The pad is

periodically scraped and the material is placed into the decanter for recycling. Facing W.

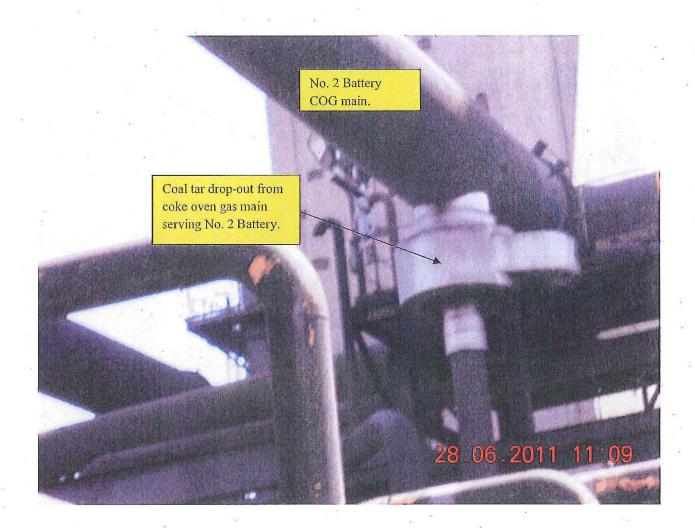


Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 11:09 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 8: Battery Number 2 piping. Coal tar is transported within the pipe indentified by the arrow. Tar drops out of the pipe at the silver attachment identified by the arrow. Facing N/NE



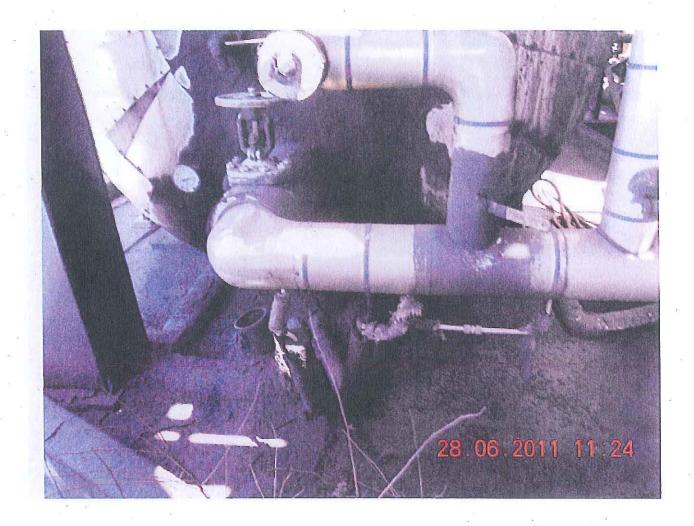
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 11:09 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 9: The silver fitting below the dark pipe is where tar drops out of the pipe

located above it. Facing N/NE.



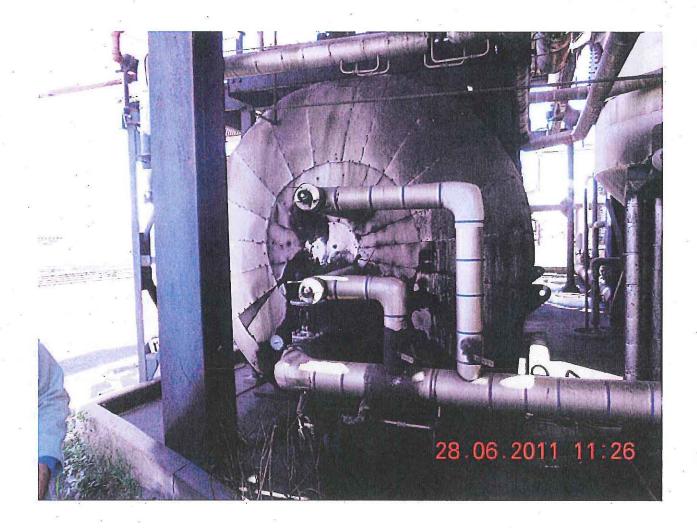
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 11:24 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 10: Close up of muck oil tank. Sludge/drippage can be seen on the floor of the

secondary containment. Facing W



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 11:26 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 11: End of muck oil tank. There are three pipes on the end of this tank. The

highest pipe decants the higher quality of oil. Facing West.

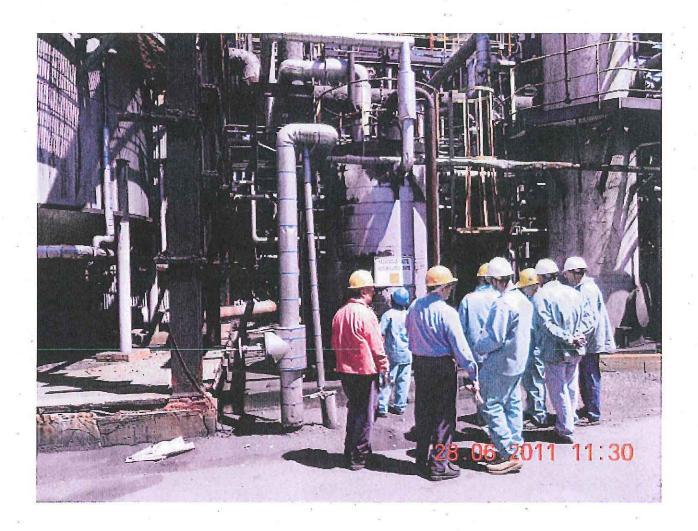


Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 11:29 a.m.
Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 12: Naphthalene Scrubber Muck Oil Tank. Facing N.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 11:30 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 13: Second photo of the Naphthalene Scrubber Muck Oil Tank. Facing North...

AM personnel state that this is an "exempted" tank. Facing N.



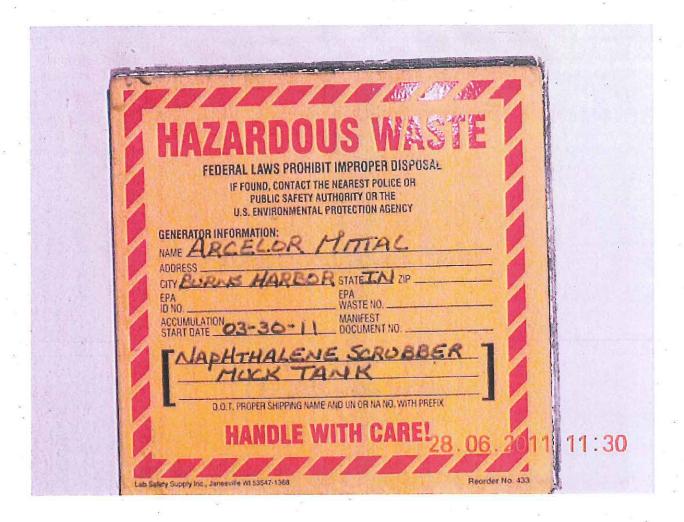
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 11:39 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 14: Label on Tar Sludge Tank.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 11:30 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 15: Hazardous waste sticker affixed onto the Naphthalene Scrubber Muck

Tank. Facing N.

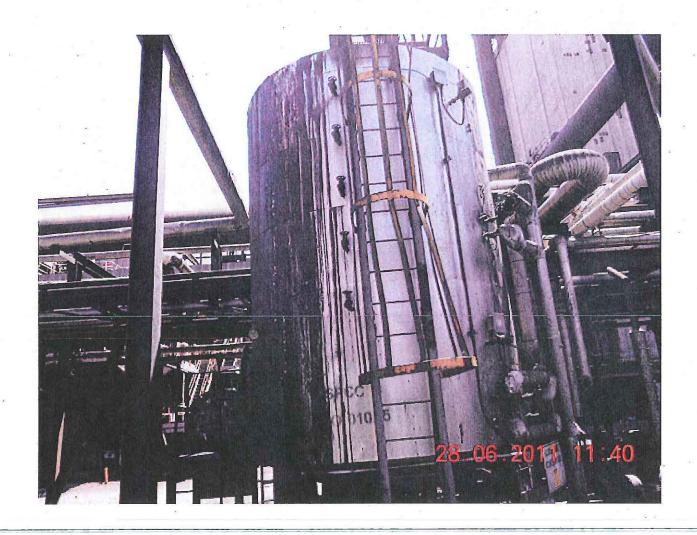


Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 11:37 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 16: Sludge mixer tank. Facing S/SE



Facility: Arcelor Mittal, IND003913423

Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 26, 2011, 11:40 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 17: Empty tank, out of service. Facing E.

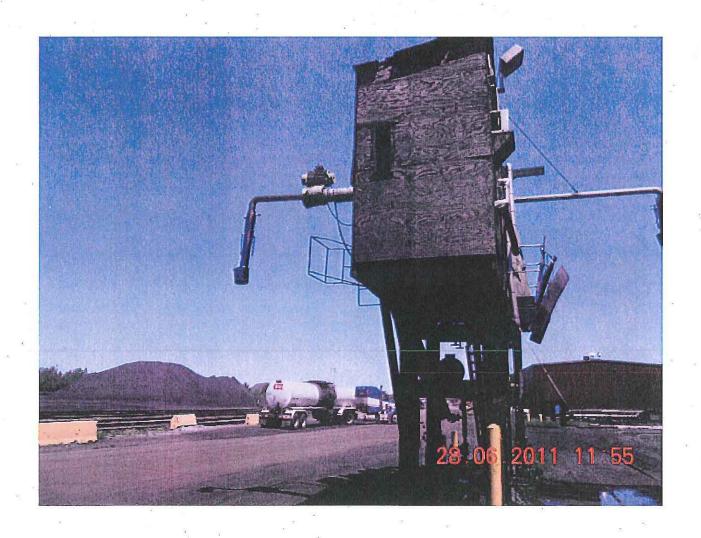


Facility: Arcelor Mittal, IND003913423
Location: 250 West US Highway 12, Burns Harbor, Indiana
Date: June 28, 2011, 11:52 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 18: Abandoned desulfurization system. Facing NE.



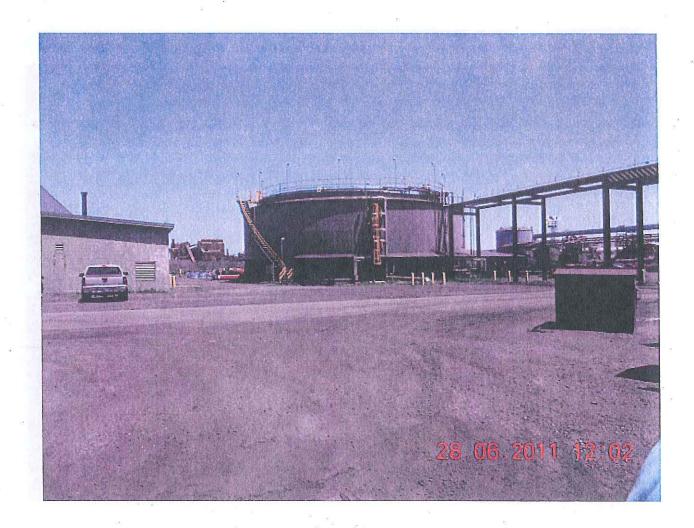
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 11:15 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 19: Tar off loading system. Facing N.



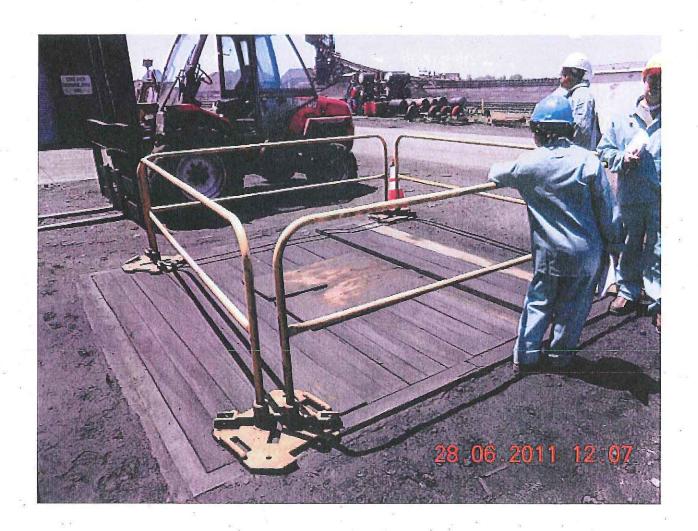
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 12:02 p.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 20: 1,000,000 gallon tank for the ammonia flushing system. This tank is kept at

half full. It contains characteristic hazardous waste. Facing N/NW.



Location: 250 West US Highway 12, Burns Harbor, Indiana Date: June 28, 2011, 12:07 p.m.

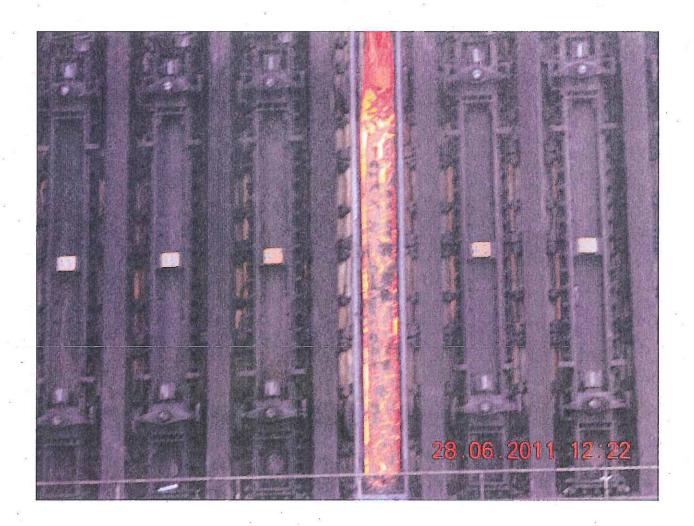
Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 21: Underground injection well. Facing NE.



Facility: Arcelor Mittal, IND003913423
Location: 250 West US Highway 12, Burns Harbor, Indiana
Date: June 28, 2011, 12:12 p.m.
Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 22: Another photograph of the underground injection well.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 12:22 p.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 23: Coke Battery Number 2, Cell number 46. Facing E.



Facility: Arcelor Mittal, IND003913423
Location: 250 West US Highway 12, Burns Harbor, Indiana
Date: June 28, 2011, 12:22 p.m.
Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 24: Coke Battery Number 2, Cell number 46. Facing E.

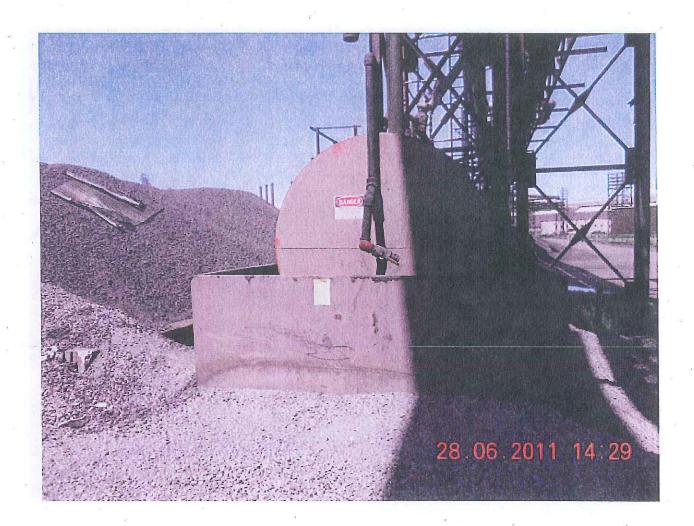


Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 12:23 p.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 25: Coke Battery Number 2, Cell number 46. Facing E.



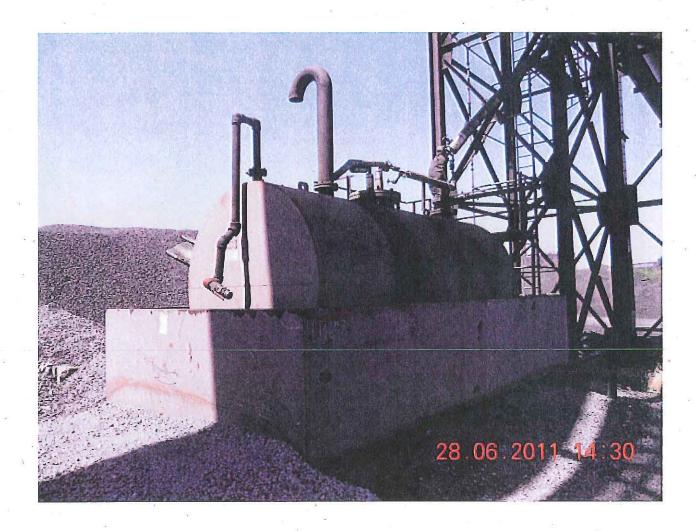
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 2:29 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 26: Coke Over Gas Condensate Tank showing secondary containment located north of the coke plant and found beneath the coke over gas line. The tank is labeled and marked. Facing N.



Facility: Arcelor Mittal, IND003913423

Location: 250 West US Highway 12, Burns Harbor, Indiana

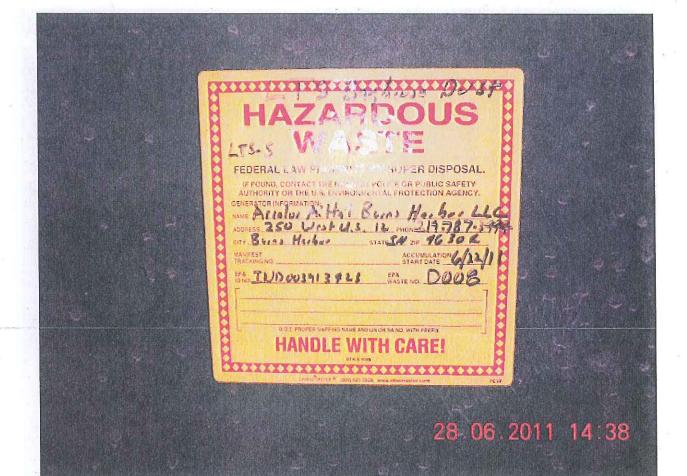
Date: June 28, 2011, 2:30 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 27: Coke Oven Gas Condensate tank. Same tank as in photograph 20. Facing

NW.



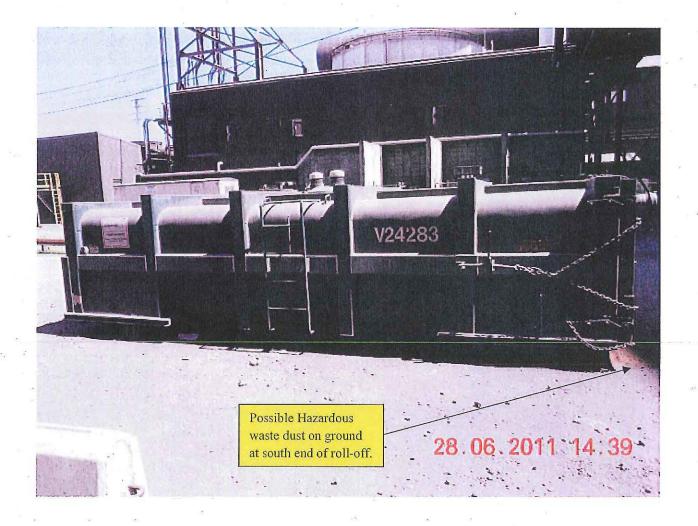
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 2:38 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 28: Hazardous waste sticker at the LTS-S bag house 20-yd roll-off showing that the waste is hazardous for lead.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 2:39 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 29: Vacuum operated roll-off box used to collect hazardous waste dust from the bag houses located at the back end of LTS #4. A small pile of possible hazardous waste dust can be seen on right side of the roll off box. This pile of dust was actually discovered two days later when EPA returned to this area for a second inspection. It is seen clearly that the pile existed at the time of this photograph. The dust is brown or rust in color. The pile of released dust can be seen in later photographs. This vacuum roll-off box is located in the furnace area of the plant. This area is 30 degrees off of "plant north". The orientation is rotated 30 degrees to the west. Plant north is close to true north. The orientation of the vacuum roll-off box is close to NE-SW Facing E.

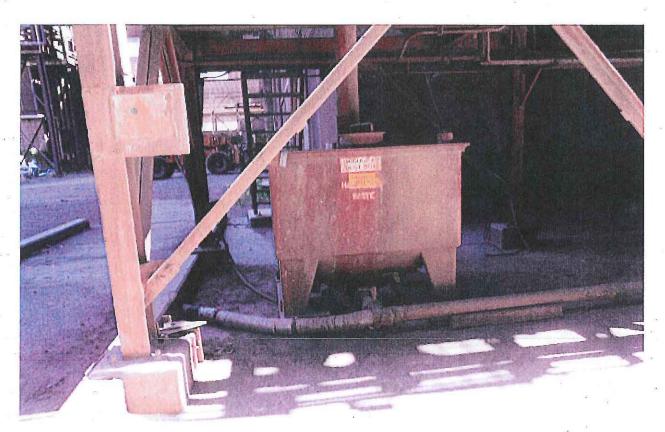


Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 2:42 p.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 30: Bag houses for the LTS #4. Facing W.



28.06.2011 14:46

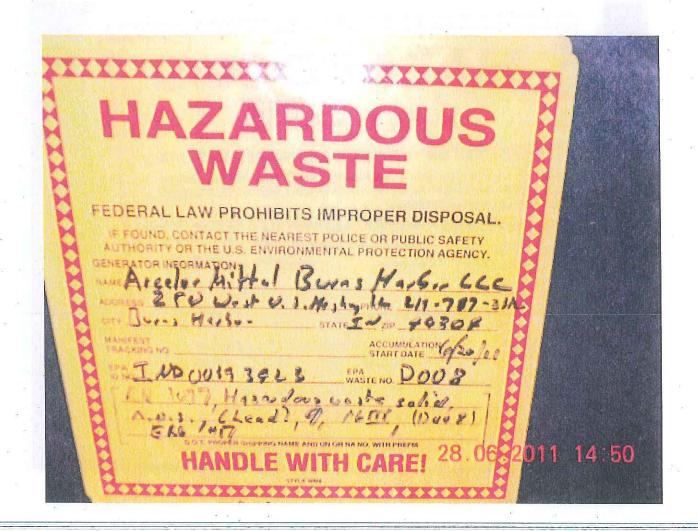
Facility: Arcelor Mittal, IND003913423

Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 2:46 p.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 31: Tar Tank, Coke Battery area, Facing N/NE



Location: 250 West US Highway 12, Burns Harbor, Indiana

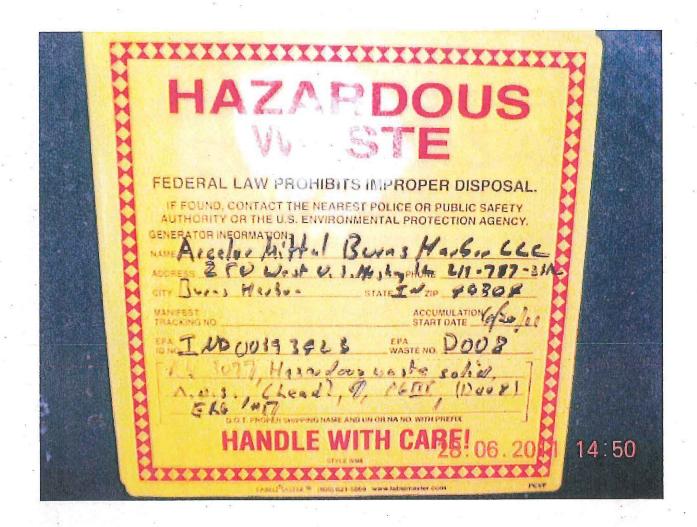
Date: June 28, 2011, 2:50 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 32: Hazardous waste label for the hazardous waste roll off at the LTS #5

baghouse. Facing S.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 2:50 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 33: Hazardous waste label for the hazardous waste roll off at the LTS #5

baghouse. Facing S.

	000000000000000000000000000000000000000
	HAZARDOUS
	WASTE
	FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.
	IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAL AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.
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	ADDRESS JOD WEST -US MANY IS
	MANEEST STATE IN ZIP 46304-9745
	TRACKING NO ACCUMULATION START DATE
A NOTE OF THE REAL PROPERTY.	END TO NO KO 62
	Spent Paulé Lique
	GOT PROPER SPECIAL AND MODELLES
	Safell, To ALC - A - I - I - I
4	DANULE WITH CARE!
	· · · · · · · · · · · · · · · · · · ·
A 10 Page 17 State 17 A	CASEL*ACTER* ONLY EXTAGOR INVESTMENT CON
	28 06 2011 15:03

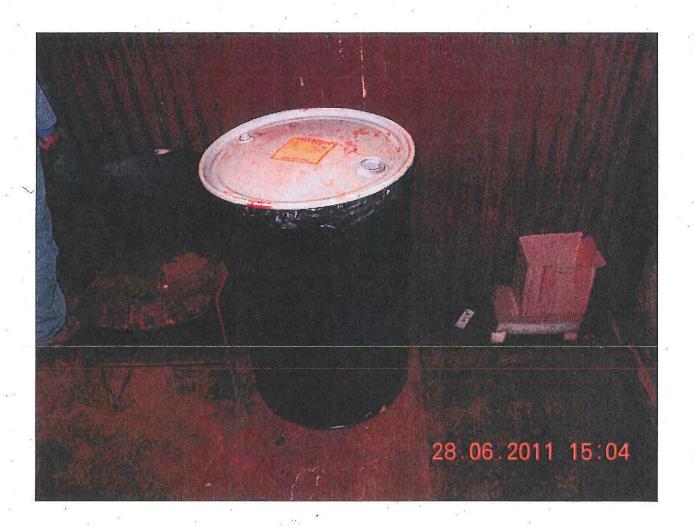
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 3:03 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 34: Hazardous waste sticker for the spent pickle liquor filter socks. Facing W.

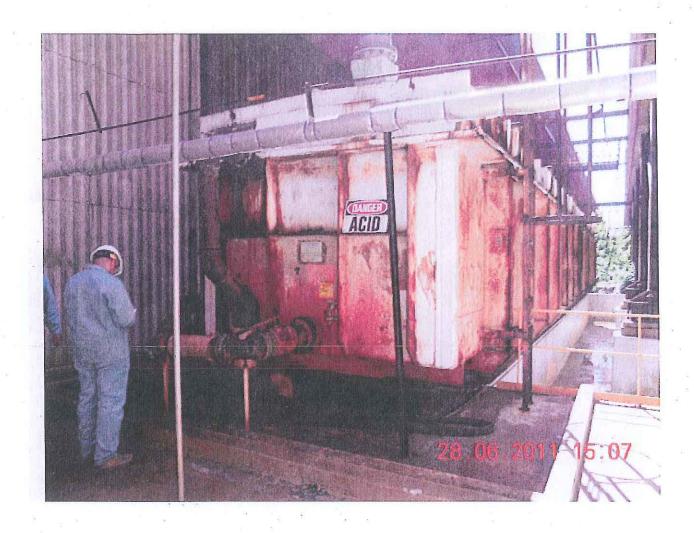


Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 26, 2011, 3:04 p.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 35: Hazardous waste spent pickle liquor filter socks.



Facility: Arcelor Mittal, IND003913423

Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 3:07 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 36: Spent pickle liquor tank. Labeled 4/22/11. Facing W.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 3:09 p.m.

Photographer: Robert Dean Smith, LPG
Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 37: Spent pickle liquor residue adjacent to the spent liquor tank. Facing W.



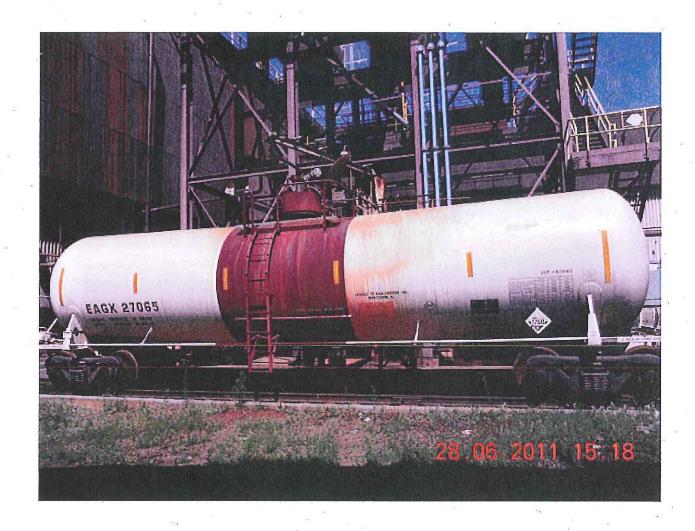
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 3:14 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 38: Spent pickle liquor tank, residue of spilled spent pickle liquor and a view of the secondary containment structure:



Location: 250 West US Highway 12, Burns Harbor, Indiana Date: June 28, 2011, 3:18 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 39: Railroad tanker car, leased to Eaglebrook, Matteson, Illinois. Facing S.



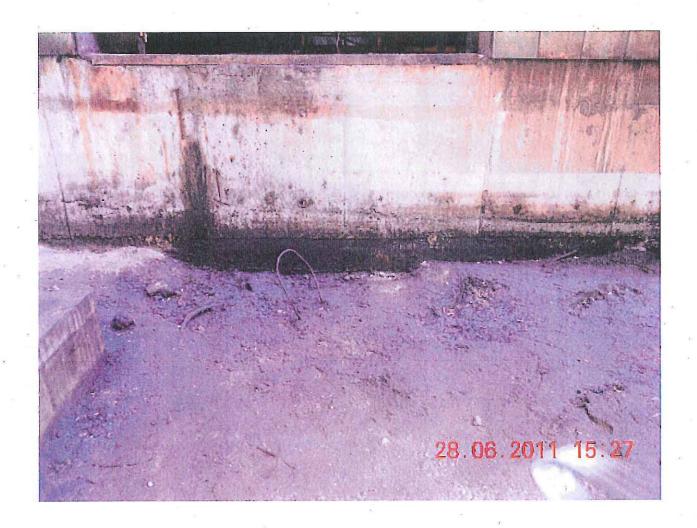
Facility: Arcelor Mittal, IND003913423 Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 3:20 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 40: Spent pickle liquor injection well number 2. Facing W.



Location: 250 West US Highway 12, Burns Harbor, Indiana Date: June 28, 2011, 3:27 p.m.

Photographer: Robert Dean Smith, LPG
Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 41: DIW Sewer manhole area, near spent pickle liquor tank. Facing S.



Facility: Arcelor Mittal, IND003913423

Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 3:29 p.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 42: DIW Sewer manhole area, near spent pickle liquor tank. Facing S.



Facility: Arcelor Mittal, IND003913423

Location: 250 West US Highway 12, Burns Harbor, Indiana
Date: June 28, 2011, 3:29 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 43: DIW Sewer manhole. Facing S.



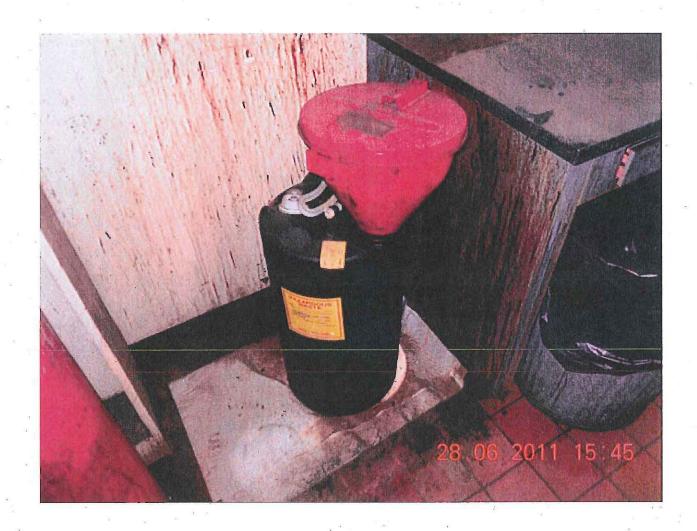
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 3:42 p,m,

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 44: Laboratory waste, F003/F005, rags. The 55-gallon drum is properly

labeled, stored closed, and properly marked. Satellite accumulation.

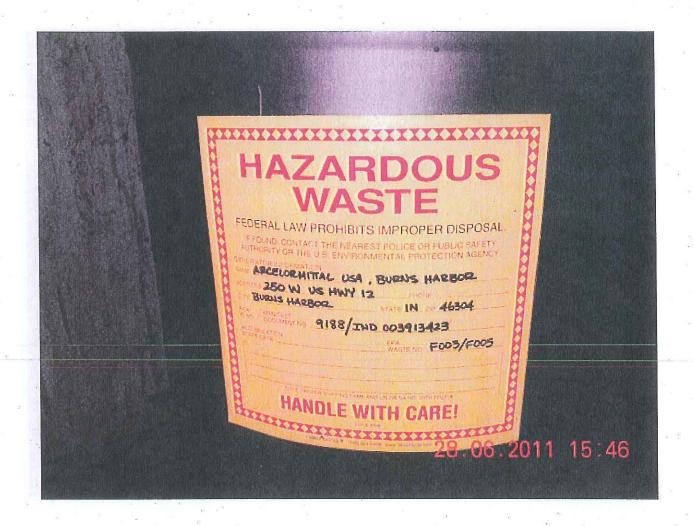


Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 3:45 p.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 45: Used oil at laboratory. The waste oil is properly labeled and managed.

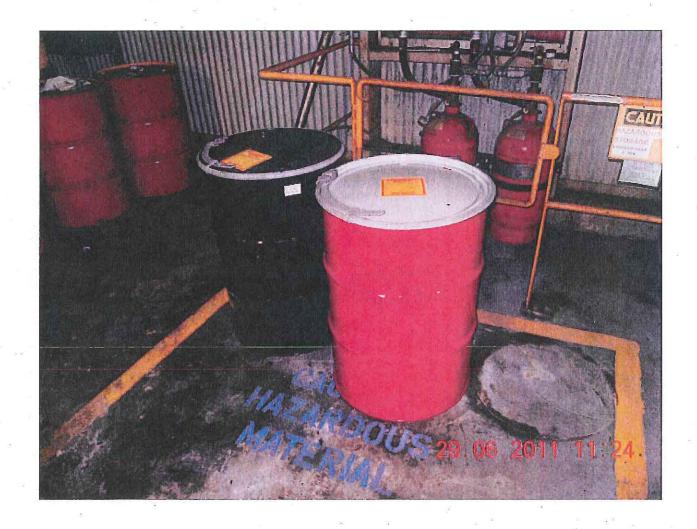


Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 28, 2011, 3:46 p.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 46: Label for the F003/F005 drum within the laboratory.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 11:24 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 47: Less than 90 day hazardous waste accumulation area at the hot dip galvanizing shop. The hazardous waste is properly managed, labeled, and stored closed. The drum on the left is chrome phosphate, dated 6/18/11. Drum on right is chrome and phosphate waste. Dated 6/18/11.



Location: 250 West US Highway 12, Burns Harbor, Indiana

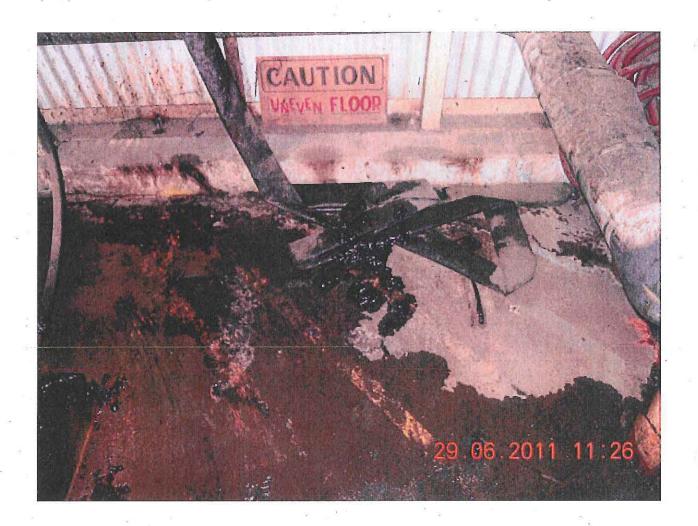
Date: June 29, 2011, 11:25 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 48: Near the less than 90 hazardous waste accumulation area, Facing south.

There is a fluid on the floor as well as grease. Facing S.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 11:26 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 49: Close-up of the grease on the floor near the less than 90 day hazardous

waste accumulation area, galvanizing shop. Facing S.



Location: 250 West US Highway 12, Burns Harbor, Indiana

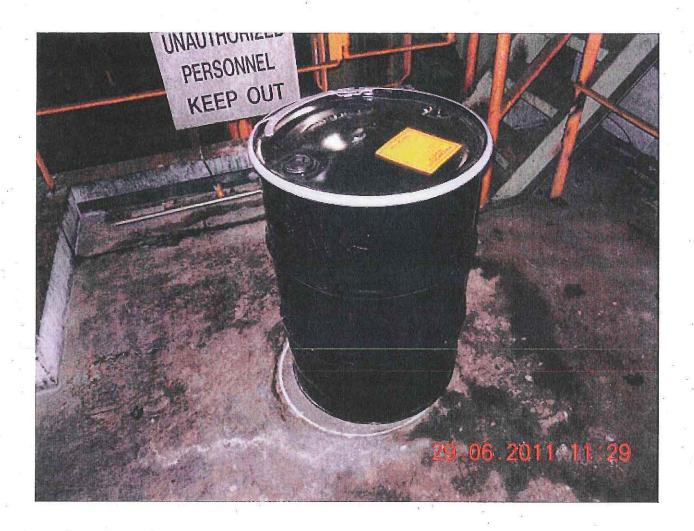
Date: June 29, 2011, 11:26 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 50: Grease bucket in storage near the less than 90 day hazardous waste

accumulation area, galvanizing shop. Facing E.



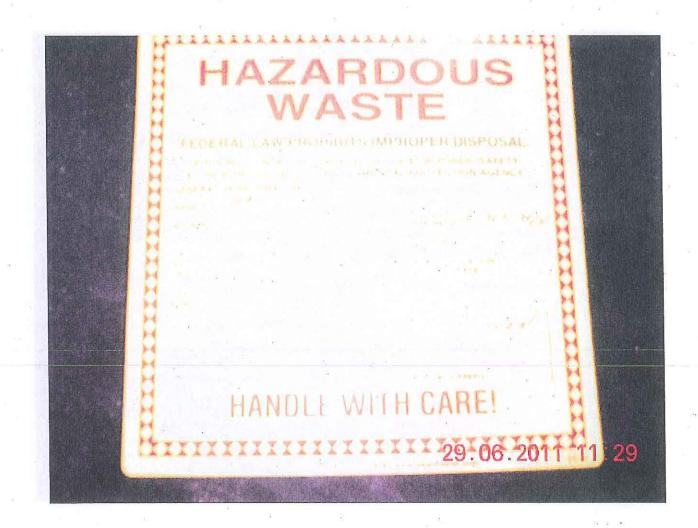
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 11:29 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 51: Satellite accumulation, waste filters, marked chromate, phosphate absorbent

materials.



Location: 250 West US Highway 12, Burns Harbor, Indiana

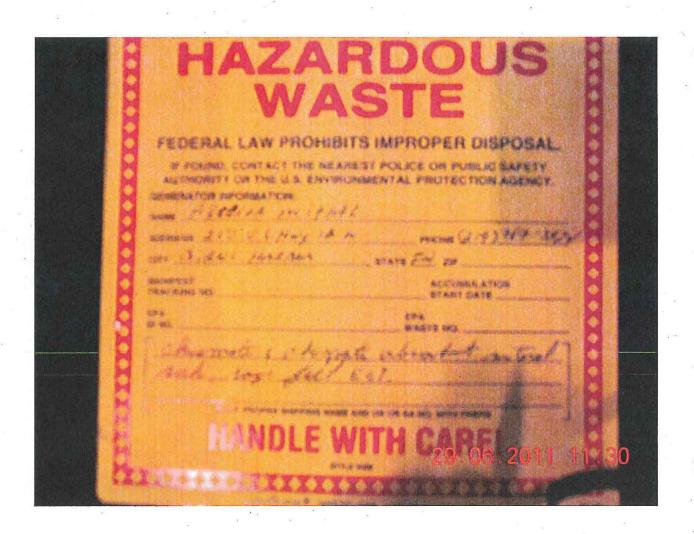
Date: June 29, 2011, 11:29 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 52: Label for the chromate & phosphate absorbent material. Washed out and

unreadable.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 11:30 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 53: Label for the chromate & phosphate absorbent material.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 11:30 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 54: Area where Chromic acid waste is generated. Blurry photograph due to the

flash malfunctioning.

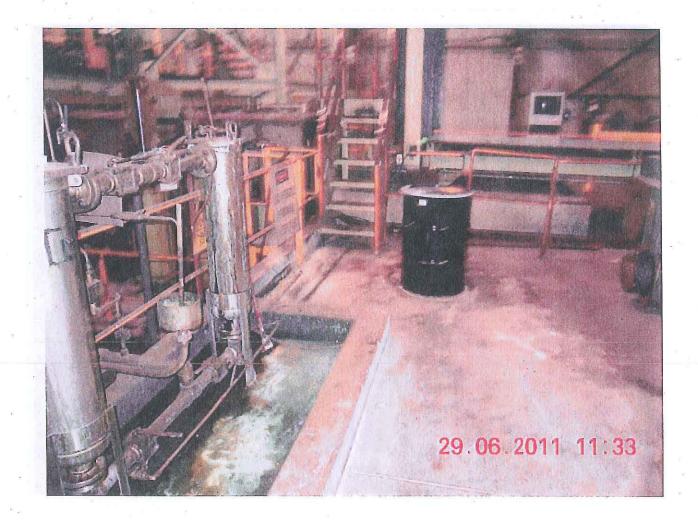


Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 11:31 a.m.
Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 55: Area where Chromic acid waste is generated.



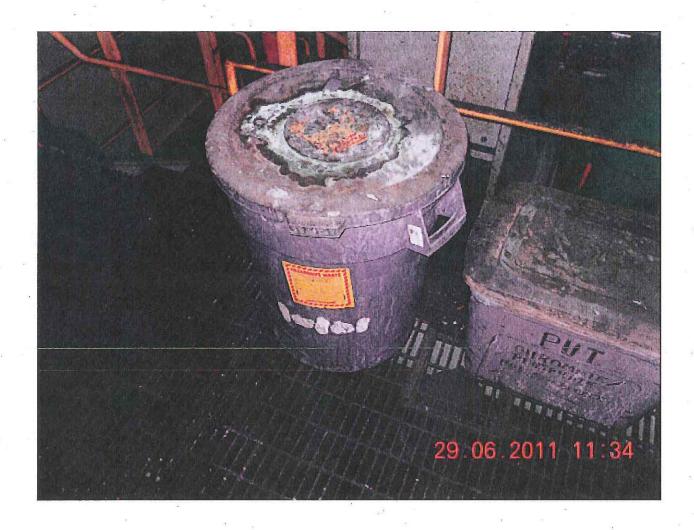
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 11:33 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 56: Area where Chromic acid waste is generated. The drum in the background is

the same SAA drum shown in Photo 51.



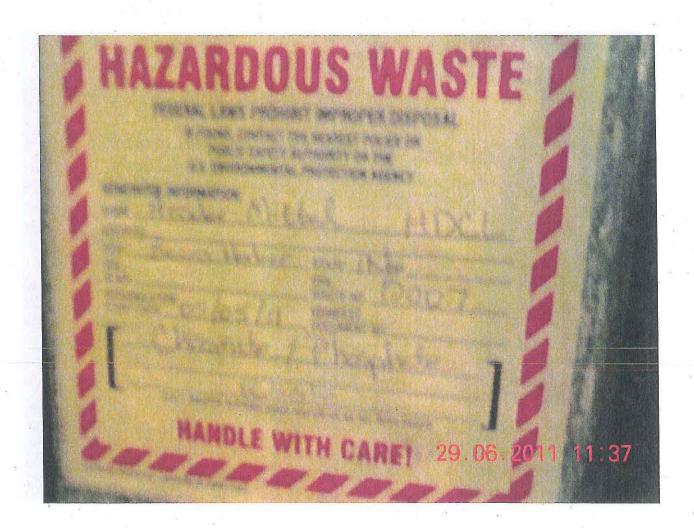
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 11:34 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 57: Satellite accumulation, chromate, phosphate waste.



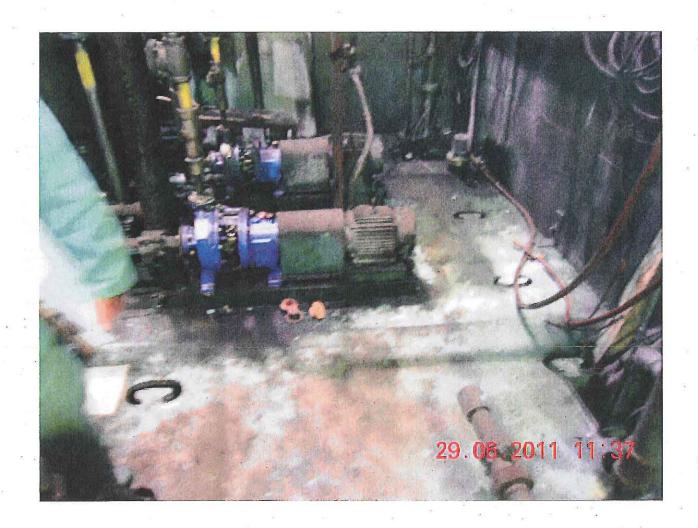
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 11:37 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 58: Label for satellite accumulation container, chromate/phosphate waste.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 11:37 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 59: Subbasement for phosphating area.



Location: 250 West US Highway 12, Burns Harbor, Indiana Date: June 29, 2011, 11:38 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

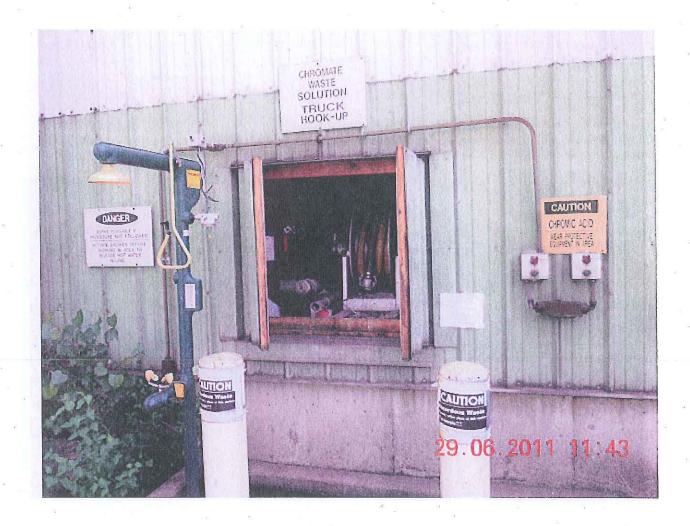
Description: Photograph 60: Subbasement, phosphating area.



Location: 250 West US Highway 12, Burns Harbor, Indiana Date: June 29, 2011, 11:40 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 61: Subbasement, phosphating area.

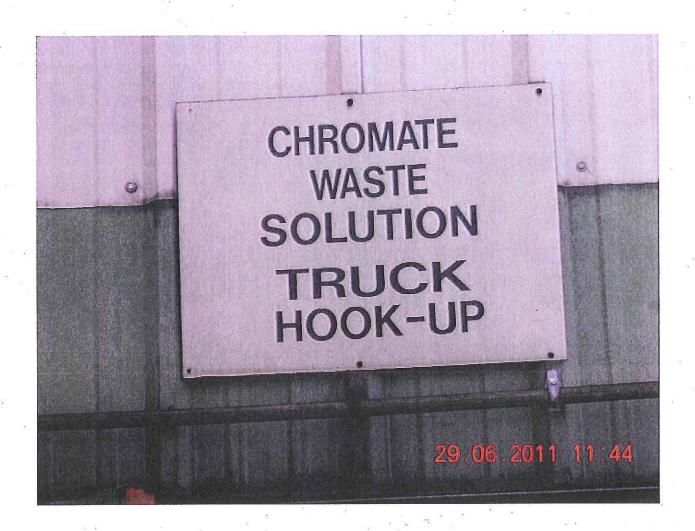


Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 11:43 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 62: Area where chromate waste is loaded onto waste trucks. Facing E.



Location: 250 West US Highway 12, Burns Harbor, Indiana

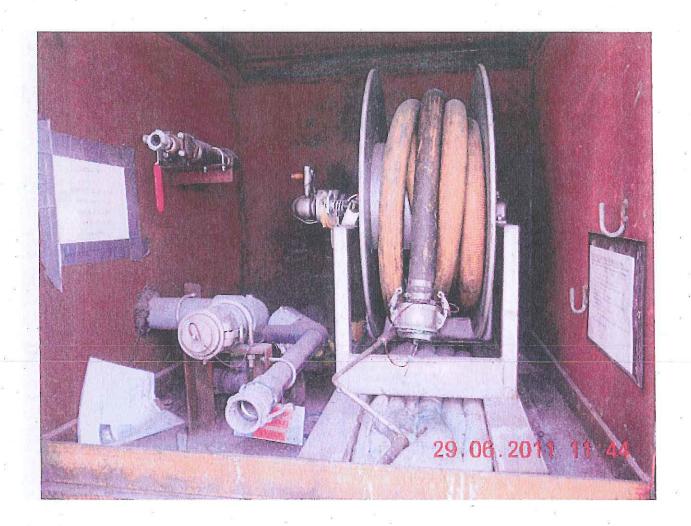
Date: June 29, 2011, 11:44 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 63: Close up of sign identifying the area as where hazardous waste trucks hook

up to load chromate waste.



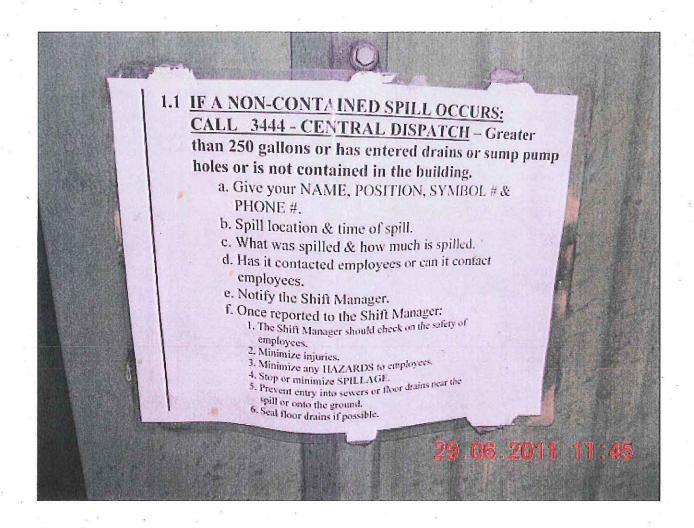
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011 11:44 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 64: Interior of the pumping station where chromate waste is pumped into

hazardous waste tanker trucks. Facing E.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 11:45 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 65: Label within the pumping station for the chromate waste providing

instruction for the event of a spill of hazardous waste.



Facility: Arcelor Mittal, IND003913423 Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 11:45 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 66: Chromate waste loading area.



Location: 250 West US Highway 12, Burns Harbor, Indiana

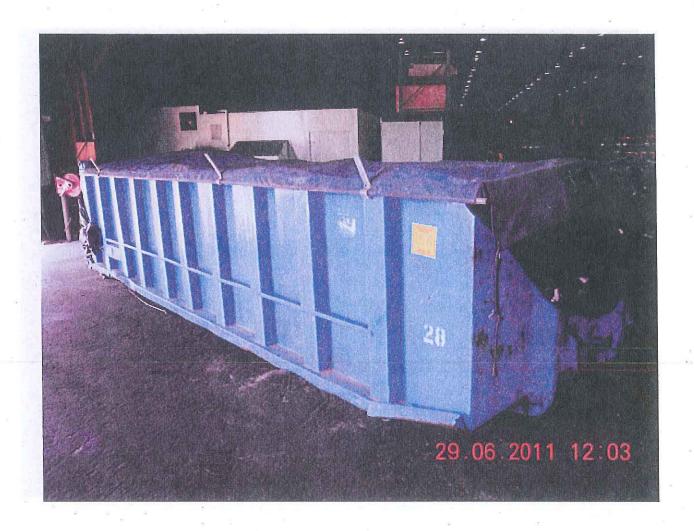
Date: June 29, 2011, 12:02 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 67: Hazardous waste roll-off box, dated June 27, 2011. The box contains hazardous waste swarf. Swarf is the grinding sludge generated from the grinding of rolls that contain

chrome or are chrome plated.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 12:03 p.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 68: A second photograph of the swarf hazardous waste roll-off box that

contains hazardous waste swarf. The roll off box goes to EQ in Harvey, Illinois.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 12:07 p.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 69: Number 6 grinder hopper with hazardous waste swarf. The process is continuous and therefore does not need a cover. Secondary containment is located beneath the hopper.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 12:10 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 70: Dredge for the waste pit that collects swarf from grinder 6. The dredge runs continuously; if it stopped, it would be impossible to restart. Thus, the hopper is continuously being filled.



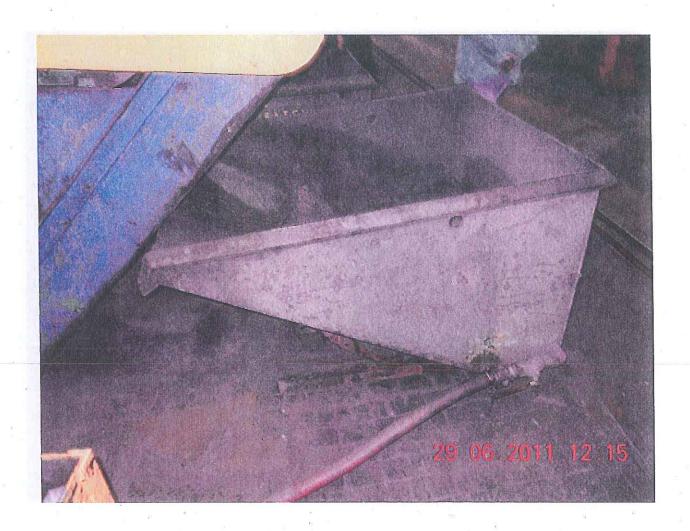
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 12:10 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 71: Hopper for grinder number 6, showing the secondary containment pan.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 12:15 p.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 72: Hopper for grinding waste.



Location: 250 West US Highway 12, Burns Harbor, Indiana

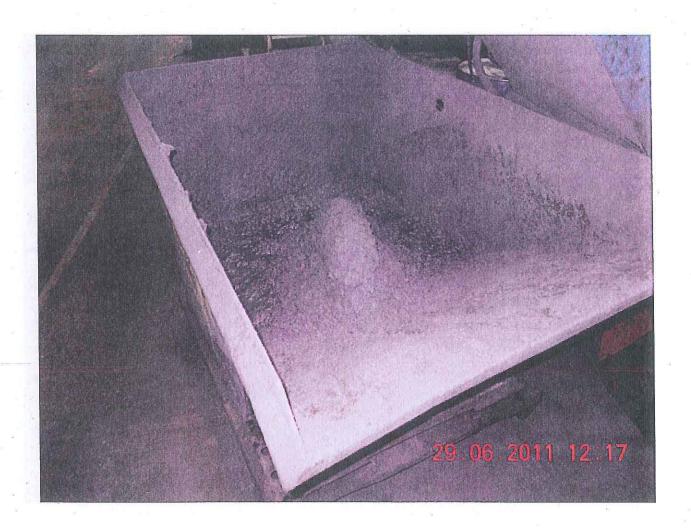
Date: June 29, 2011, 12:16 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 73: Hopper for grinder number 5 is on the left and the hopper for grinder

number 4 is on the right.



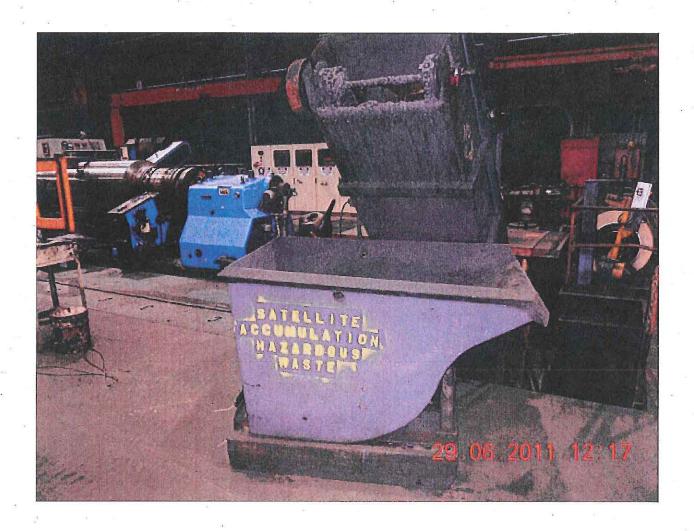
Facility: Arcelor Mittal, IND003913423

Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 12:17 p.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 74: Interior for hopper for grinder number 3.



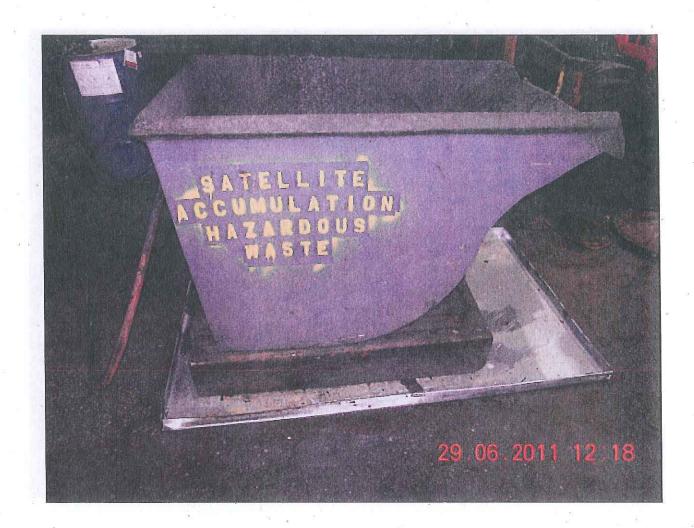
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 12:17 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 75: Hopper for grinder number 3.



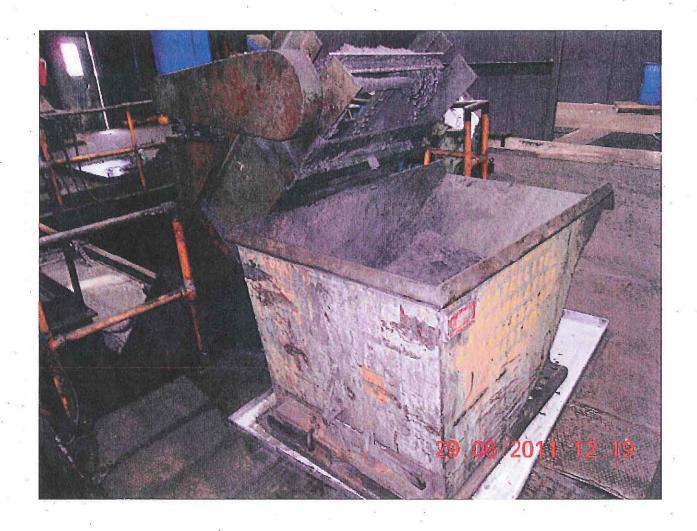
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 12:18 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 76: Hopper for grinder number 2, with secondary containment.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 12:19 p.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 77: Hopper for grinder number 1. Secondary containment is found beneath the

hopper.

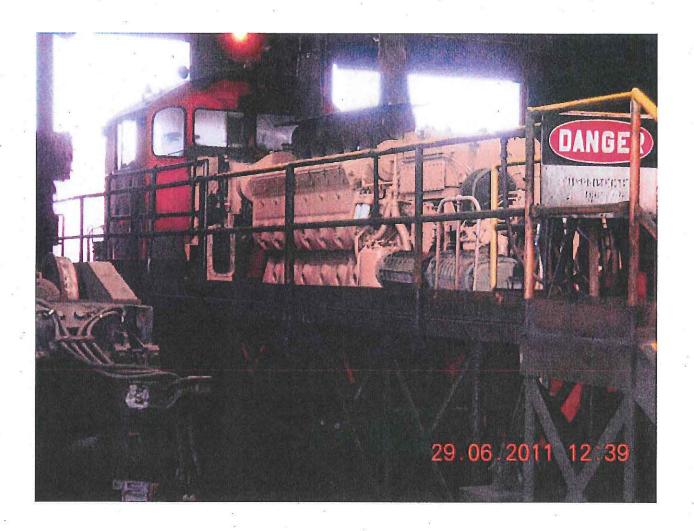


Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June29, 2011, 12:38 p.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 78: Parts washer in maintenance shop. Facing E.



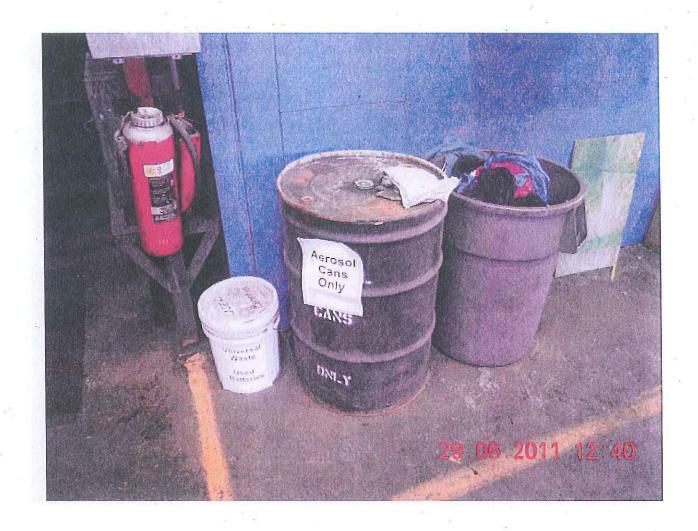
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 12:39 p.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 79: Diesel electric engine undergoing maintenance in the maintenance shop.

Facing NE.



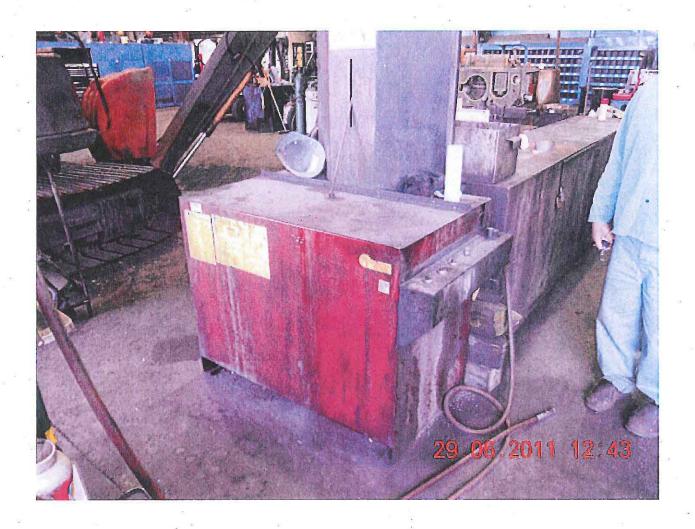
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 12:40 p.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 80: Aerosol cans, satellite accumulation area, maintenance shop. On the left is a 5 gallon bucket of universal waste container holding used batteries. A container of fresh rags is on the

right.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 12:43 p.m.
Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 81: Parts washer, maintenance shop. Facing NE.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 12:47 p.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 82: grinding wheel, maintenance shop. The grinding dust has not been

characterized for hazardous constituents.



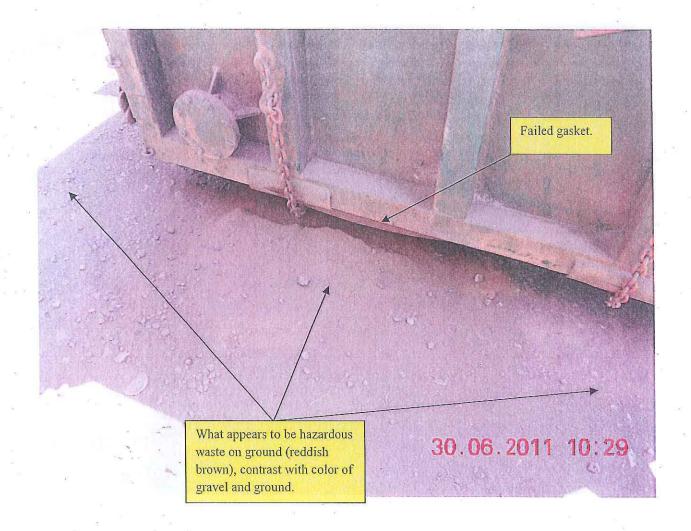
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 29, 2011, 12:47 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 83: Bead blasting box, maintenance shop. Facing S.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 30, 2011, 10:29 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 84: Hazardous waste dust released from vacuum roll off box, LTS shop. The gasket for the roll off box can be seen just below the bottom edge of the horizontal beam of the roll off box. This vacuum roll-off box is located in the furnace area of the plant. This area is 30 degrees off of "plant north". The orientation is rotated 30 degrees to the west. Plant north is close to true north, The orientation of the vacuum roll-off box is close to NE-SW. Facing N.



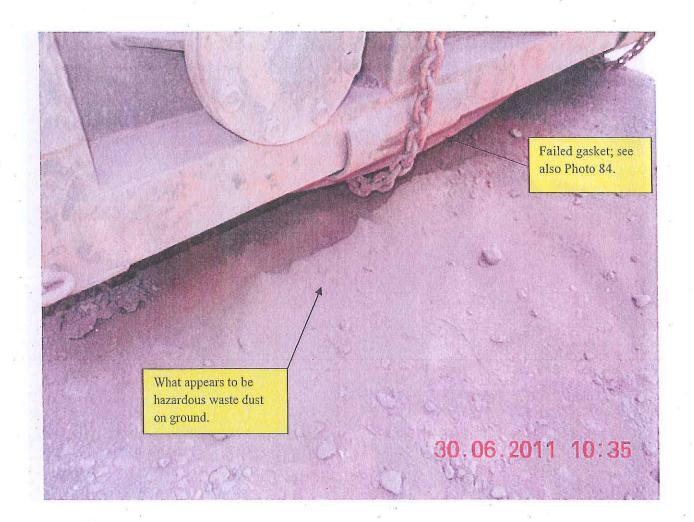
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 30, 2011, 10:30 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 85: Roll off box that released hazardous waste at the LTS shop. This is the opposite end of the release, showing the serial number of the box. This vacuum roll-off box is located in the furnace area of the plant. This area is 30 degrees off of "plant north". The orientation is rotated 30 degrees to the west. Plant north is close to true north. The orientation of the vacuum roll-off box is close to NE-SW Facing N.



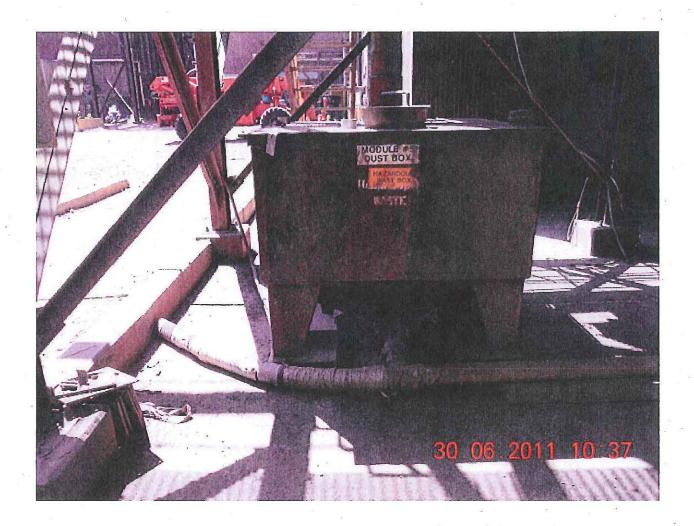
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 30, 2011, 10:35 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 86: Hazardous waste LTS baghouse dust released from the vacuum roll off box. The blown gasket can be seen under the chain. This vacuum roll-off box is located in the furnace area of the plant. This area is 30 degrees off of "plant north". The orientation is rotated 30 degrees to the west. Plant north is close to true north. The orientation of the vacuum roll-off box is close to NE-SW. Facing N/NE.



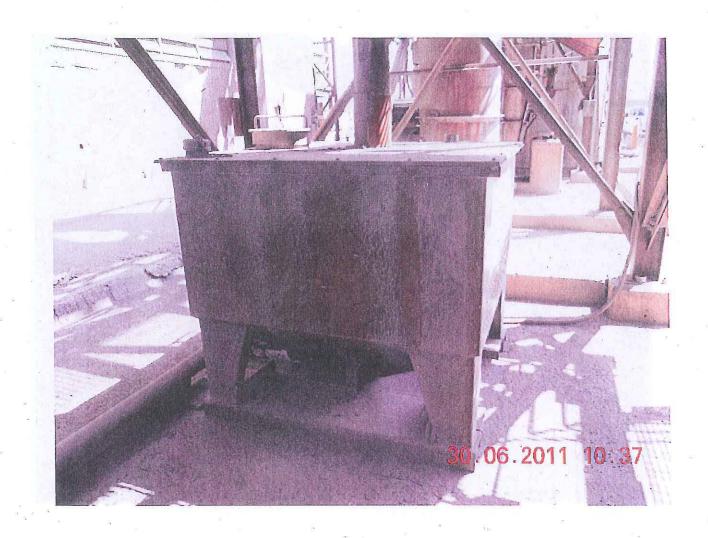
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 30, 2011, 10:37 a.m.

Photographer: Robert Dean Smith, LPG
Camera: Nikon Coolniy, 12 0 meganiyels

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 87: Hazardous waste dust box at LTS.



Facility: Arcelor Mittal, IND003913423
Location: 250 West US Highway 12, Burns Harbor, Indiana
Date: June 30, 2011, 10:37 a.m.
Photographer: Robert Dean Smith, LPG
Camera: Nikon Coolpix, 12.0 megapixels
Description: Photograph 88: Dust hopper at LTS.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 30, 2011, 10:38 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 89: Dust in secondary containment located under the dust box labeled "Module

#5".

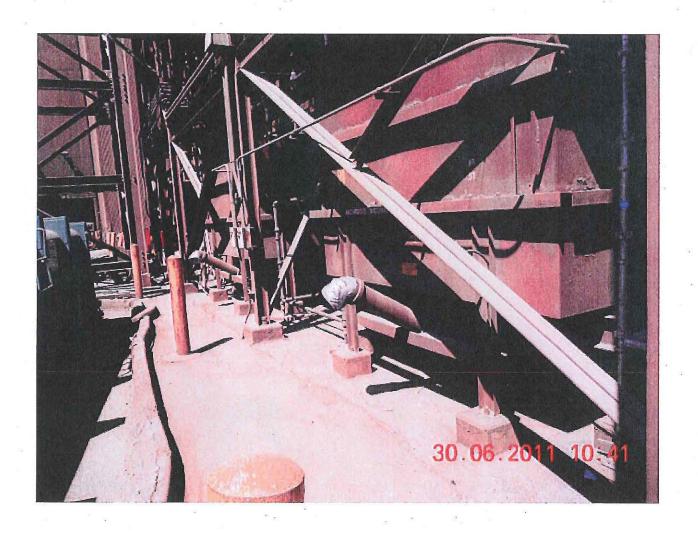


Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 30, 2011, 10:40 a.m.
Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 90: Dust box 3 and 4. Facing N.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 30, 2011, 10:41 a.m.
Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 91: Dust boxes 1 & 2. Facing S.



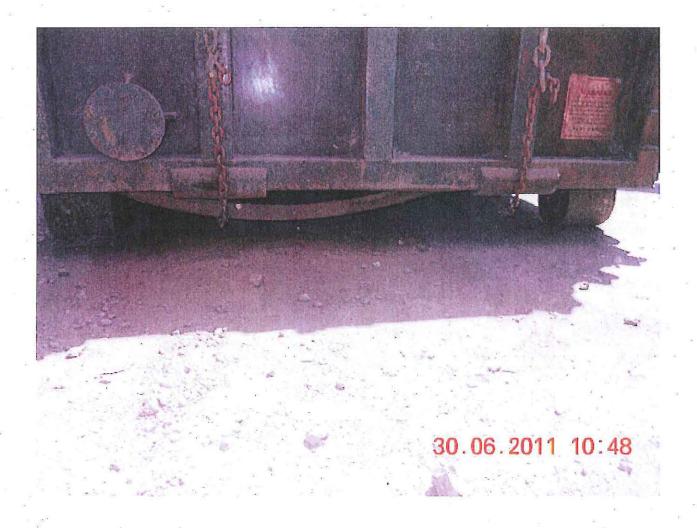
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 30, 2011, 10:43 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 92: Vacuum roll off box number V2910. The roll off box is marked and labeled. There is no sign of leakage from this roll off box. This vacuum roll-off box is located in the furnace area of the plant. This area is 30 degrees off of "plant north". The orientation is rotated 30 degrees to the west. Plant north is close to true north. The orientation of the vacuum roll-off box is close to NE-SW. Facing SW.



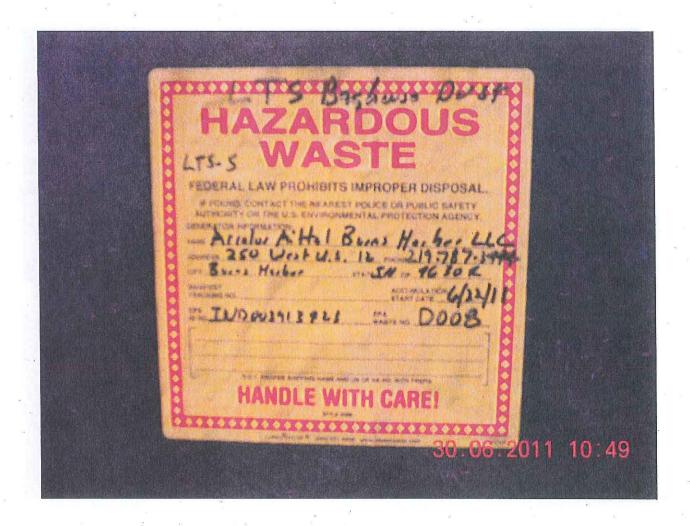
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 30, 2011, 10:48 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 93: Close up of blown gasket on roll off box V24283. Arecelor Mittal had already taken a sample of the released dust which is evident by the absence of the small pile of released dust. A small amount of dust remains on the ground. This vacuum roll-off box is located in the furnace area of the plant. This area is 30 degrees off of "plant north". The orientation is rotated 30 degrees to the west. Plant north is close to true north. The orientation of the vacuum roll-off box is close to NE-SW.

Facing NE.



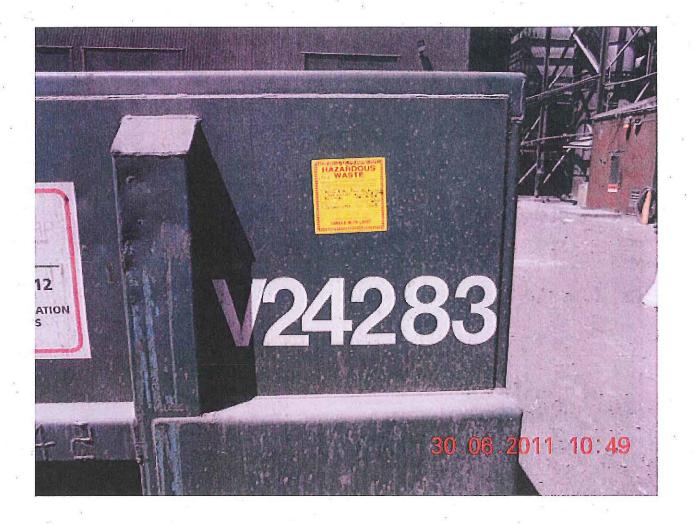
Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 30, 2011, 10:49 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 94: Label on vacuum roll off box V24283. The label states that the contents of

the roll off box is LTS baghouse dust and has the hazardous characteristic code of D008.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 30, 2011, 10:49 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 95: Identification of the vacuum roll off box V24283 which had a blown gasket which caused a release of hazardous waste LTS dust to the environment. This vacuum roll-off box is located in the furnace area of the plant. This area is 30 degrees off of "plant north". The orientation is rotated 30 degrees to the west. Plant north is close to true north. The orientation of the vacuum roll-off box is close to NE-SW. Facing SW.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 30, 2011, 11:01 a.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 96: Secondary containment for the spent pickle liquor tank. The water is rust in color. Facing W.

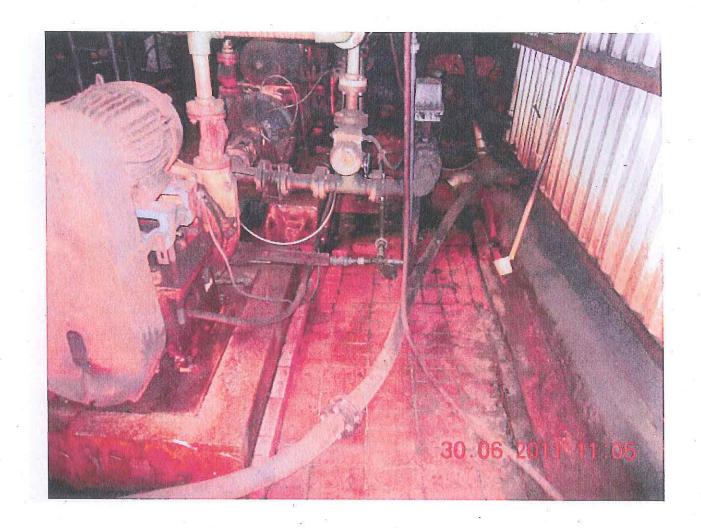


Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 30, 2011, 11:01 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 97: Secondary containment for the spent liquor tank. Facing W.



Facility: Arcelor Mittal, IND003913423

Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 30, 2011 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 98: Pump for the spent pickle liquor tank.



Location: 250 West US Highway 12, Burns Harbor, Indiana

Date: June 30, 2011 11:06 a.m.

Photographer: Robert Dean Smith, LPG Camera: Nikon Coolpix, 12.0 megapixels

Description: Photograph 99: Trough adjacent to the spent pickle liquor tank pump. The trough is being

flushed at the time of this photograph.